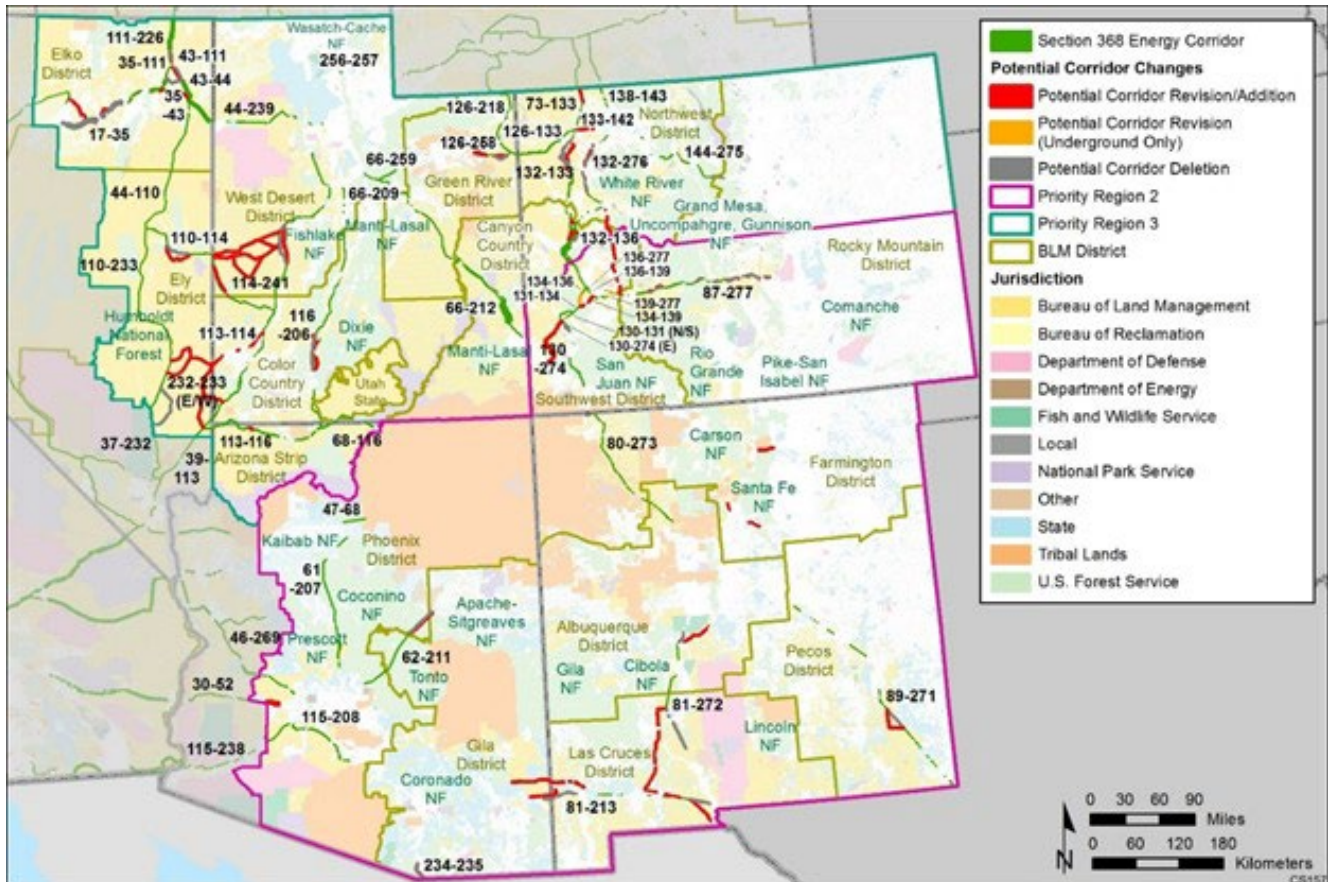




REGIONS 2 & 3: STAKEHOLDER INPUT- REPORT

Section 368 Energy Corridor Regional Review



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Regions 2 & 3 Stakeholder Input on Regions 2 & 3 Report

This document is a record of stakeholder input received on the Regions 2 & 3 Report during the Regional Review and serves as a reference document for the Regions 2 & 3 Report.

The Regions 2 & 3 Report was released to the public on August 22, 2019. Stakeholders were given 45 days to provide input; the public input period closed September 23, 2019. All written stakeholder input received within that timeframe is provided in this document. This input was used to develop the final report.

Stakeholder input focused on the general Regional Review process, environmental concerns, and cultural resource and tribal concerns regarding individual Section 368 energy corridors within Regions 2 & 3. There were recommendations for specific corridor revisions, deletions, and additions, as well as recommendations for the potential corridor additions identified in the Regions 2 & 3 Report.

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From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10016] - Webmaster Receipt
Date: Friday, August 23, 2019 2:22:49 PM

Thank you for your input, Marc Stavropoulos.

The tracking number that has been assigned to your input is **10016**. Please refer to the tracking number in all correspondence relating to your input.

Date: August 23, 2019 14:22:38 CDT

First Name: Marc
Last Name: Stavropoulos
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Prescott National Forest

Input

I am providing input as the Program Manager for Range and Botany on the Prescott National Forest. My comments pertain to 61-207. 1)I am requesting that when the powerline crosses a fence line and when there is a gate within the area that the gate/fence be grounded to avoid shock from opening the gates. I am not sure what the standard distance is that requires grounding of the fence but, I didn't find any discussion of that as a standard operating procedure. 2)The two tracks that were created during construction as well as used for maintenance have become motorized travel routes and these should require signage that does not promote motorized travel as well as barriers such as gates and possibly other physical barriers such as boulders to discourage travel on these routes.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10017] - Webmaster Receipt
Date: Thursday, September 5, 2019 10:33:01 AM
Attachments: [ID 10017 THPOConsultationLetter.pdf](#)

Thank you for your input, Mark Altaha.

The tracking number that has been assigned to your input is **10017**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 05, 2019 10:32:38 CDT

First Name: Mark
Last Name: Altaha
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: White Mountain Apache Tribe

Input

Please refer to the attached tribal consultation letter.

Attachments

THPO Consultation Letter.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



White Mountain Apache Tribe
Office of Historic Preservation
PO Box 1032
Fort Apache, AZ 85926
Ph: (928) 338-3033 Fax: (928) 338-6055

To: A. Scott Feldhausen, BLM District Manager

Date: September 5, 2019

Re: *Input for the West-Wide Energy Corridors Regional Review - 1780(G000)*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project, dated August 29, 2019 . In regards to this, please attend to the following statement below.

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above 368 Corridor Review reports in Regions 2 and 3 which includes proposals for revisions, deletions, and/or additions to the energy corridors. Upon reviewing the document and reports we've determined the proposed project plans regarding energy placements on Federal lands across Arizona, Colorado, Nevada, New Mexico, and Utah will not have a adverse effect on the White Mountain Apache tribe's historic properties and/or traditional cultural properties.

Thank you for your continued collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark T. Altaha

White Mountain Apache Tribe – THPO
Historic Preservation Office

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10018] - Webmaster Receipt
Date: Monday, September 9, 2019 3:50:44 PM

Thank you for your input, Benjamin Pykles.

The tracking number that has been assigned to your input is **10018**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 09, 2019 15:50:14 CDT

First Name: Benjamin

Last Name: Pykles

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Church History Department, The Church of Jesus Christ of Latter-day Saints

Input

We commend the Section 368 Interagency Workgroup for their excellent work in creating the Regions 2 and 3 Report. The report, together with the corridor summaries and appendices, are clearly written, well organized, and easy to access. The Church of Jesus Christ of Latter-day Saints remains supportive of the proposed revision to corridor 113-114 in Utah, which would add a corridor segment (braid) at MP 30 connecting the corridor to the authorized TransWest Express route in eastern Nevada. Of most importance to the Church, the proposed corridor revision would avoid the Mountain Meadows Massacre Site National Historic Landmark, which is a highly sensitive area for cultural resources related to the massacre. Any ground disturbance in the area of the National Historic Landmark has high potential for disturbing human remains and other objects associated with the massacre. The Church is grateful for the ways the agencies are seeking to fulfill their mandated responsibilities to National Historic Landmarks (as stipulated in Section 110(f) of the National Historic Preservation Act) "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark" (54 U.S.C. § 306107).

In addition to expressing our support for the Regions 2 and 3 Report, we respectfully request a correction to the name of the Church on page D-4 in section D.2 of Appendix D. Please use the full and correct name of the Church – "the Church of Jesus Christ of Latter-day Saints" – instead of the inaccurate abbreviation "LDS Church," just like you did on page D-2 of Appendix D.

Thank you again for all of your hard work in creating this excellent report and supplementary materials.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10019] - Webmaster Receipt
Date: Tuesday, September 10, 2019 12:46:12 PM

Thank you for your input, Kristen Long.

The tracking number that has been assigned to your input is **10019**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 10, 2019 12:46:00 CDT

First Name: Kristen

Last Name: Long

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Bureau of Land Management

Input

The Socorro Field Office Resource Management Plan (2010) currently is not in conformance with the proposed corridor. Next time we update our plan we will take the corridor into consideration.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10020] - Webmaster Receipt
Date: Tuesday, September 10, 2019 4:06:28 PM
Attachments: [ID_10020_SLCOEnergyCorridorCommentLetter910.pdf](#)

Thank you for your input, Michael Shea.

The tracking number that has been assigned to your input is **10020**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 10, 2019 16:06:16 CDT

First Name: Michael

Last Name: Shea

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Salt Lake County

Input

[Blank]

Attachments

SLCO Energy Corridor Comment Letter 9-10.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



September 10, 2019

Jennifer Wilson
Mayor

Catherine Kanter
Deputy Mayor, Regional
Operations

Mike Reberg
Associate Deputy Mayor,
Regional Operations

US Bureau of Land Management
US Forest Service
US Department of Energy

To Whom It May Concern:

I would like to personally thank you for the opportunity to allow Salt Lake County to comment on the Federal Agencies review of possible changes to the Western United States Energy Corridors.

Salt Lake County is Utah's most dense and urbanized county with a population of over a million residence. With such a large amount of homes, businesses and industry it is no coincidence Salt Lake County is also the largest county consumer of electricity in the State. While the technicalities of where and who the municipalities within Salt Lake County get their electricity from is complicated, it is unquestionable the vast majority of the county's energy generation comes from carbon intensive fossil fuels.

The Mayor of Salt Lake County, Jenny Wilson, has made a commitment to reduce the county's reliance on carbon intensive forms of energy because of their negative effects on the global climate and the states air quality.

Although there are no corridors within the boundaries of the county, many of the proposed changes would affect how it would receive electricity. As Salt Lake County seeks to transition to cleaner forms of energy, one of the primary hurdles it faces is transmission access and capacity.

Therefore, Salt Lake County would like to voice its support for the proposed modifications to the following corridors

- Corridor 113-114 (MP 108 to MP 118)
- Corridor 113-114 (MP 81 to MP 90)
- Corridor 110-114 (MP 133 to MP 137)

These modifications will help integrate and expand the BLM's designated Solar Energy Zones in Milford Flat, Escalante Valley, Wah Wah Valley Utah.

By expanding access to the Solar Energy Zones, federal agencies will make it easier and more affordable for Salt Lake County and its varying interests to acquire more solar energy, which will lead to a reduction in use for carbon intensive forms of energy.

We encourage the agencies to work with all interested stakeholders to create a balanced and thoughtful approach actualizes these needed outcomes.

Again, thank you for taking the time to read our comment and please reach out if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Michael Shea". The signature is written in a cursive, flowing style.

Michael Shea
Environmental Program Manager
Salt Lake County

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10021] - Webmaster Receipt
Date: Wednesday, September 11, 2019 9:53:23 AM
Attachments: [ID 10021 M19008223913WWECRegion2and3ReportAGFDComments.pdf](#)

Thank you for your input, Andrew Cavalcant.

The tracking number that has been assigned to your input is **10021**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 11, 2019 09:53:06 CDT

First Name: Andrew
Last Name: Cavalcant
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Arizona Game and Fish Department

Input

[Blank]

Attachments

M19-008223913 WWEC Region 2 and 3 Report - AGFD Comments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



September 11, 2019

Mr. Jeremy Bluma
Bureau of Land Management
(208) 373-3847
Jbluma@blm.gov

Mr. Reggie Woodruff
U.S. Forest Service
(202) 205-1196
Reginal.woodruff@usda.gov

Re: Section 368 Energy Corridor: Regions 2 and 3 Regional Review: Stakeholder Input

Dear Mr. Bluma and Mr. Woodruff:

The Arizona Game and Fish Department (Department) has reviewed the *Section 368 Energy Corridor Review: Regions 2 and 3 report*, published by the U.S. Bureau of Land Management (BLM), U.S. Forest Service (USFS), and the U.S. Department of Energy (DOE). Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority and public trust responsibilities for management of the state's fish and wildlife resources. In addition, the Department manages threatened and endangered species through Section 6 authorities and the Department's 10(a)1(A) permit. It is the mission of the Department to conserve Arizona's diverse fish and wildlife resources and manage for sage, compatible outdoor recreation opportunities for current and future generations.

The Section 268 Energy Corridor Review: Regions 2 and 3 acknowledges the concerns the Department raised in previous comment periods. The Department recognizes and supports planning efforts that contribute to the state's and regional economic growth needs, similarly the Department acknowledges that the agencies responsible for this undertaking have taken the Department's comments and recommendations into consideration, specifically, the potential realignment of corridor 62-211 to the east and the possible addition of the new Interagency Operating Procedures (IOP) for wildlife migration corridors and habitat. The Department is supportive of this approach provided the Department's expertise is included in these analyses.

Corridor 61-207, between MP#65-23, is proximate to pronghorn habitat. This area is important to pronghorn during fawning season. It is the Department's understanding that agency recognizes the importance of this habitat but further analysis of this species is not a consideration for corridor level planning. However, the Department still recommends coordinating with us to ensure construction time frames do not cause disturbance to Pronghorn during fawning season.

The Department appreciates the opportunity to provide comments on the Section 368 Energy Corridor Review: Regions 2 and # report. The Department would like to continue to coordinate directly with BLM and USFS on this effort. If you have any comments please contact me at acavalcant@azgfd.gov or 623-236-7222.

Sincerely,
Andrew Cavalcant
Project Evaluation Program Specialist, Habitat Branch

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10022] - Webmaster Receipt
Date: Thursday, September 12, 2019 12:50:54 PM
Attachments: [ID_10022_2.1.4Revisions.docx](#)

Thank you for your input, lynn greene.

The tracking number that has been assigned to your input is **10022**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 12, 2019 12:50:35 CDT

First Name: lynn
Last Name: greene
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Lucky Corridor, LLC

Input

[Blank]

Attachments

2.1.4 Revisions.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

2.1.4 Potential Energy Growth near Existing Section 368 Energy Corridors or Potential Corridor Additions Union County, New Mexico

Union County, in northeastern New Mexico, has significant wind energy resources and substantial support to develop wind energy. Today, at least on approximately 19,000 acres of state trust land and 630,000 acres of private land host active wind farm development. Within Union County and the state's other nearby renewable energy zones, there is 3.8 TWh of prime wind resource that is yet undeveloped, the generation of which would be competitive for export in a regional market*. Additional transmission capacity is needed to transport electricity westward to a major energy hub. Lucky Corridor, LLC (Lucky Corridor), is proposing two 345-kV transmission lines (Lucky Corridor transmission lines). The Lucky Corridor transmission lines are supported by the State of New Mexico and the Coalition of Renewable Energy Landowner Association to provide flexibility to an aging grid and facilitate renewable energy development in northeastern New Mexico. Lucky Corridor has identified two potential routes that could serve this transmission need. This report includes two potential Section 368 energy corridor additions in this area, across both BLM- and USFS-administered lands. The potential corridor additions could facilitate supplying New Mexico with the renewable energy required to meet the Energy Transition Act it passed in 2019, supplying the western Energy Imbalance Market, which New Mexico plans to join in 2020, as well as supplying the proposed major interstate electric transmission network, and would enhance grid reliability (see Section 3).

*National Renewable Energy Laboratory, Technical Report NREL/TP-6A20-57830 August 2013 Contract No. DE-AC36-08GO28308

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10023] - Webmaster Receipt
Date: Tuesday, September 17, 2019 1:11:31 PM

Thank you for your input, Nick Sandberg.

The tracking number that has been assigned to your input is **10023**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 17, 2019 13:11:09 CDT

First Name: Nick
Last Name: Sandberg
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: San Juan County, Utah

Input

San Juan County, Utah, concurs with the findings in the current August 2019 Report for Regions 2 and 3 pertinent to San Juan County, Utah.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10024] - Webmaster Receipt
Date: Thursday, September 19, 2019 5:27:40 PM
Attachments: [ID_10024_20190919_FinalSNWACmntLtr.pdf](#)

Thank you for your input, Kimberly Reinhart.

The tracking number that has been assigned to your input is **10024**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 19, 2019 17:27:08 CDT

First Name: Kimberly

Last Name: Reinhart

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Southern Nevada Water Authority

Input

Please refer to the attached comment letter dated September 19, 2019, thank you.

Attachments

20190919_Final SNWA Cmmt Ltr.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

SOUTHERN NEVADA WATER AUTHORITY™

100 City Parkway, Suite 700 • Las Vegas, NV 89106
MAILING ADDRESS: PO. Box 99956 • Las Vegas, NV 89193-9956
702-862-3400 • snwa.com

Submitted electronically

September 19, 2019

West-Wide Energy Corridor Region 2 & 3 Joint Federal Agencies:

SUBJECT: AUGUST 2019 REGION 2 & 3 REPORT SECTION 368 ENERGY CORRIDOR REVIEW - PUBLIC COMMENTS

Southern Nevada Water Authority (SNWA) appreciates the opportunity to provide recommendations for corridor modifications regarding the Section 368 West-Wide Energy Corridor (WWEC) August 2019 Regions 2 & 3 Report Review. SNWA is a political subdivision of the State of Nevada and is responsible for managing the regional water resources of southern Nevada.

As stated in the February 12, 2018 comment letter submitted to the WWEC joint agencies by SNWA regarding public review of the Section 368 Corridor Abstracts Region 3, SNWA has authorized rights-of-way (ROWs) within and adjacent to the existing WWEC alignment (Clark, Lincoln, and White Pine Counties Groundwater Development [GWD] Project, N-78803). Design and siting decisions for these ROWs were based on the analysis of construction specifications for a water pipeline and transmission lines, site-specific topography, and proximity to major roads, highways, sensitive resources, sensitive land designations, existing ROWs, existing utilities, and tribal and private lands. Since these criteria are similar to the WWEC siting principles, we are referencing our alignments again in this comment letter, as they may help the WWEC joint agencies determine where to modify or retain the corridor. Project maps and shapefiles showing the SNWA-granted ROW alignments within the WWEC Region 3 were submitted with the February 12, 2018 comment letter. Highlighted on the maps are the areas where the ROWs diverge from the WWEC due to technical constraints. The WWEC joint agencies may consider modifying the WWEC in these areas to accommodate for the technical constraints, which other energy alignments will also face, and to minimize land disturbance.

With the release of the August 2019 Regions 2 & 3 Rep011 Review showing potential corridor deletions and revisions, SNWA would like to highlight an additional area where existing and proposed 230 kilovolt (kV) transmission lines are located, including the GWD Project transmission line.¹ The WWEC joint agencies propose to delete the current Conidor 110-114 alignment and revise its location to along Highway 50 to avoid overlapping with Cave Creek, Cooper, and South Schell Inventoried Roadless Areas, and the High Schells Wilderness within the Humboldt-Toiyabe National Forest. The WWEC joint agencies further propose to minimize

¹ The referenced GWD Project transmission line, for which SNWA has applied to the U.S. Forest Service for a Special Use Permit, crosses the Humboldt-Toiyabe National Forest. Although this additional area was generally shown on the February 12, 2018 map submittals, it was not highlighted as a concern since it was located within the current designated WWEC. Nevertheless, the shapefiles submittal included the entire GWD Project alignment, including the referenced transmission line.

impacts by aligning Highway 50 as the northern boundary of the potential corridor revision to avoid the Inventories Roadless Areas. However, the GWD Project 230kV transmission line and two existing 230kV transmission lines are located within the current designated Corridor 110-114 (please see the shapefiles submittal dated February 12, 2018 for the GWD Project alignment). The transmission lines run parallel to each other and share the same access and maintenance roads. Revising the corridor to along Highway 50 would cause new surface disturbance and negatively affect sensitive resources, including Priority Habitat Management Area for Greater Sage-Grouse. Therefore, SNWA supports the current designated Corridor 110-114 and does not support the proposed deletion or revision to the corridor.

Please continue to keep SNWA informed of the status of the review. If you have any questions regarding these comments or need additional information, please contact me at (702) 862-3457 or kimberly.reinhart@snwa.com.

Sincerely,

Handwritten signature of Kimberly Reinhart in blue ink.

Kimberly Reinhart
Environmental Planning Supervisor

KR:CL:sn

Cc: Scott Krantz, SNWA Energy Management Department

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10025] - Webmaster Receipt
Date: Thursday, September 19, 2019 5:50:46 PM
Attachments: [ID_10025_OjotoZiaMileageMap.pdf](#)

Thank you for your input, Lynn GREENE.

The tracking number that has been assigned to your input is **10025**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 19, 2019 17:50:31 CDT

First Name: Lynn
Last Name: GREENE
Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Lucky Corridor, LLC

Input

The map on the cover page and on page 21 of the Energy Policy Act of 2005 Section 368 Energy Corridor Review REGIONS 2 and 3 Report omits the federal and tribal lands on the "Ojo to Zia Mileage Map.pdf" attached with this input comment.

Whether the Santa Fe Line is collocated with existing facilities, or is built as a common facility, shared by transmission providers and replacing the existing infrastructure in this federal utility corridor, these federal lands shown on the "Ojo to Zia Mileage Map.pdf" uploaded today may also be impacted. Please add these lands to Report's map, and also add these federal and tribal lands to our Section 368 nomination # 10188.

Attachments

Ojo to Zia Mileage Map.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10026] - Webmaster Receipt
Date: Friday, September 20, 2019 1:21:09 PM

Thank you for your input, Matthew Feier.

The tracking number that has been assigned to your input is **10026**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 20, 2019 13:20:54 CDT

First Name: Matthew
Last Name: Feier
Email:

Are you submitting input on the behalf of an organization? No

Input

I would like to review and potentially comment on the DOE proposed Energy Corridor Plan, as I own property within Gunnison County Colorado that likely is or will be adjacent to the proposed corridor. Thank you. ---Matt

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10027] - Webmaster Receipt
Date: Friday, September 20, 2019 3:13:08 PM
Attachments: [ID_10027_GunnisonCoSection368EnergyCorridorCommentsRegion2and3.pdf](#)

Thank you for your input, David Baumgarten.

The tracking number that has been assigned to your input is **10027**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 20, 2019 15:12:41 CDT

First Name: David
Last Name: Baumgarten
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Gunnison County, Colorado

Input

Please find the attached comments.

Respectfully submitted, this Friday, September 20th, 2019.

David Baumgarten

Attachments

Gunnison Co - Section 368 Energy Corridor Comments - Region 2 and 3.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

September 20, 2019

Jeremy Bluma

Bureau of Land Management

jbluma@blm.gov

Reggie Woodruff

U.S. Forest Service

Reginal.woodruff@usda.gov

Re: Section 368 Energy Corridor Review, Regions 2 and 3; August 2019; Gunnison, Colorado

Sirs:

The Board of County Commissioners of Gunnison County, Colorado (“Gunnison County”) has the authority to protect and promote the health, welfare and safety of the people of Gunnison County, and the authority to regulate land use planning and environmental quality and protection (including wildlife) in Gunnison County, including activities on private and federal lands. Pursuant to these authorities, the Gunnison County Commissioners have duly adopted policies and regulations including the review, approval, conditioning or denial of certain proposed activities and users of public and private land and natural resources.

It is based on that authority – and the responsibilities that authority places on Gunnison County – that Gunnison County offers these comments on the Section 368 Energy Corridor Review, Regions 2 and 3, (the “Review”) relevant to Gunnison County, Colorado. These comments are explicitly the type of new and significant information requested in the notice, August 22, 2019, from the West-wide Energy Corridor Information Center.

I. AUTHORITY OF GUNNISON COUNTY

It is important to note that among the authorities relied upon by Gunnison County in making these comments are those granted to Gunnison County pursuant to Colorado Revised Statute 24-65.1-101 et seq., which include the authority “to designate areas and activities of state interest and, after such designation, [to] administer such areas and activities of state interest and promulgate guidelines for the administration thereof.” (See: C.R.S. 24-65.1-101 (2)(b)). Among the areas of state interest included in that grant of authority are:

1. Areas around “key facilities” in which development may have a material effect upon the key facility or the surround community. (See: C.R.S. 24-65.1-201.) “Key facilities” include “major facilities of public utility,” include “transmission lines...of electrical utilities...pipelines (of) utilities providing natural gas or other petroleum derivatives.” (See: C.R.S. 24-65.1-104(7)). Among the activities of state interest included in that grant of authority is “site selection and construction of major facilities of a public utility.” (See C.R.S. 24-65.1-203 (1)(f)). Gunnison County has and will continue to rely on these authorities regarding the subject proposed corridor.
2. Areas containing or having a significant impact upon, historical, natural, or archaeological resources of statewide importance and;
3. Natural hazard areas.

The proposed corridor has implications for all of those areas and activities of state interest for which Gunnison County has legal authority.

It must be noted that Gunnison County comments submitted February 23, 2018 were neither referenced nor addressed in the Review. (Those comments are attached as Appendix A.)

All of this current comment letter is the type and quality of information requested for a Regional Review.

II. GUNNISON SAGE-GROUSE

The Section 368 Energy Corridor Regional Reviews – Region 2, dated May, 2018, notes regarding Gunnison Sage-grouse (“GuSG”):

“Settlement Agreement. RFI: re-route to avoid GuSG habitat. GIS Analysis: critical habitat located within the corridor. Comment on abstract: between MP 77 to MP 86 the only way to avoid GuSG critical habitat would be to shift the corridor north. Corridor maintenance practices/results can fragment GuSG habitat. Recommend a review of all maintenance and repair practices to reduce impacts; conformance with the Gunnison Basin GuSG Conservation Agreement on Federal Lands is a mandatory part of all corridor practices in the Gunnison Basin. There is already existing energy infrastructure that has been identified as having an adverse impact on GuSG; development of the corridor would further jeopardize the vitality [of] the species.” The Review further notes: “There is an opportunity to consider revising the corridor in the GMUG National Forest, including shifting the corridor between MP 77 and MP 86 to avoid GuSG critical habitat while still encompassing the existing transmission line. (2) Given the wide expanse of the critical habitat along the other areas where the corridor intersects GuSG critical habitat, alternate routes would still require siting through GuSG critical habitat. Further analysis and consultation with the USFWS to determine the presence of the GuSG and its proposed

critical habitat within the area would be required prior to authorizing development in the corridor, but further analysis is not a consideration for corridor-level planning.”

There are a number of significant detrimental consequences presented for the species GuSG by the proposed corridor.

A. Preamble.

Gunnison County offers two preambles regarding GuSG –which should be read consistently with each other. The first preamble is that it is of utmost importance to remember seminal federal actions that greatly contributed to the massive and permanent elimination of unique and unrecoverable GuSG habitat in the Gunnison Basin. These federal actions included creation of the Blue Mesa Reservoir, which resulted in a loss of at least 50 linear miles of brood-rearing habitat, multiple leks and significant nesting/winter habitat. The second preamble is the fundamental disconnect between ongoing federal, state, local and private efforts to sustain and enhance the GuSG populations and habitat, and federal planning efforts and activities on the ground such as the corridor that would actually continue to jeopardize the species and its habitat. The Review neither recognizes nor reconciles these conflicts.

B. The GuSG is a formally designated “threatened species.”

As the Agency knows, the GuSG has been formally designated pursuant to the Endangered Species Act as a “threatened species.” That is, GuSG are a natural resource of federal, state and local importance. In the initial review process of the proposed corridor, Gunnison County knew that the designated corridor in Gunnison County (87-277) crossed a large amount of GuSG habitat, but the species was not listed at that time and Gunnison County did not yet have its scientifically based and empirically tested GuSG Habitat Prioritization Tool

(“HPT”) to help analyze potential impacts of the corridor on GuSG habitat. Gunnison County now has that tool and will share the tool and its application with the Agency.

C. Spatial Relationship of Corridor to GuSG Elements.

Please note the following regarding the corridor as proposed within the Gunnison Basin:

1. GuSG occupied habitat (area and linear feet/miles) crossed by the corridor in the Gunnison Basin: 26,141 acres, roughly 56 miles long.
 2. GuSG Tier 1 habitat (area and lineal feet/miles) crossed by the corridor in the Gunnison Basin: 15,927 acres, 42.5 miles long.
 3. Number of GuSG leks within 0.6 miles of the corridor in the Gunnison Basin: 24
 4. Number of GuSG leks within 2.0 miles of the corridor in the Gunnison Basin: 30
- D. The proposed corridor detrimentally impacts the unique habitat most valuable to GuSG.

A primary task of significance not adequately performed in the Review is to correlate the corridor with GuSG habitat. A necessary beginning of that task is to understand the relative values of GuSG habitat – of which “Tier 1” habitat is the least fragmented, least impacted, and most valuable of GuSG habitat available in the species’ entire environment.

The definition of Tier 1 habitat as adopted by the Gunnison Basin Sage-grouse Strategic Committee is that habitat scoring 15 or higher using the following scoring characteristics.

1. Active lek = 15
2. Unknown (status) lek = 10
3. Inactive lek = 8
4. Historic lek = 1
5. Brood rearing habitat = 14 (updated from the 2018 score in 2019)

6. Nesting/summer/fall/winter habitat < 750 from brood rearing and winter habitat = 15
7. Nesting/summer/fall/winter habitat > 750 from brood rearing and winter habitat = 10
8. Areas within active leks and < 2 miles from the edge of active leks = 5
9. Areas inside the occupied habitat polygon regardless of habitat = 1

Scores can be additive. As an example, there may be nesting/summer/fall/winter habitat within an active lek polygon <750 from brood rearing and winter habitat: $15 + 15 = 30$

There is also negative scoring from “impacts”:

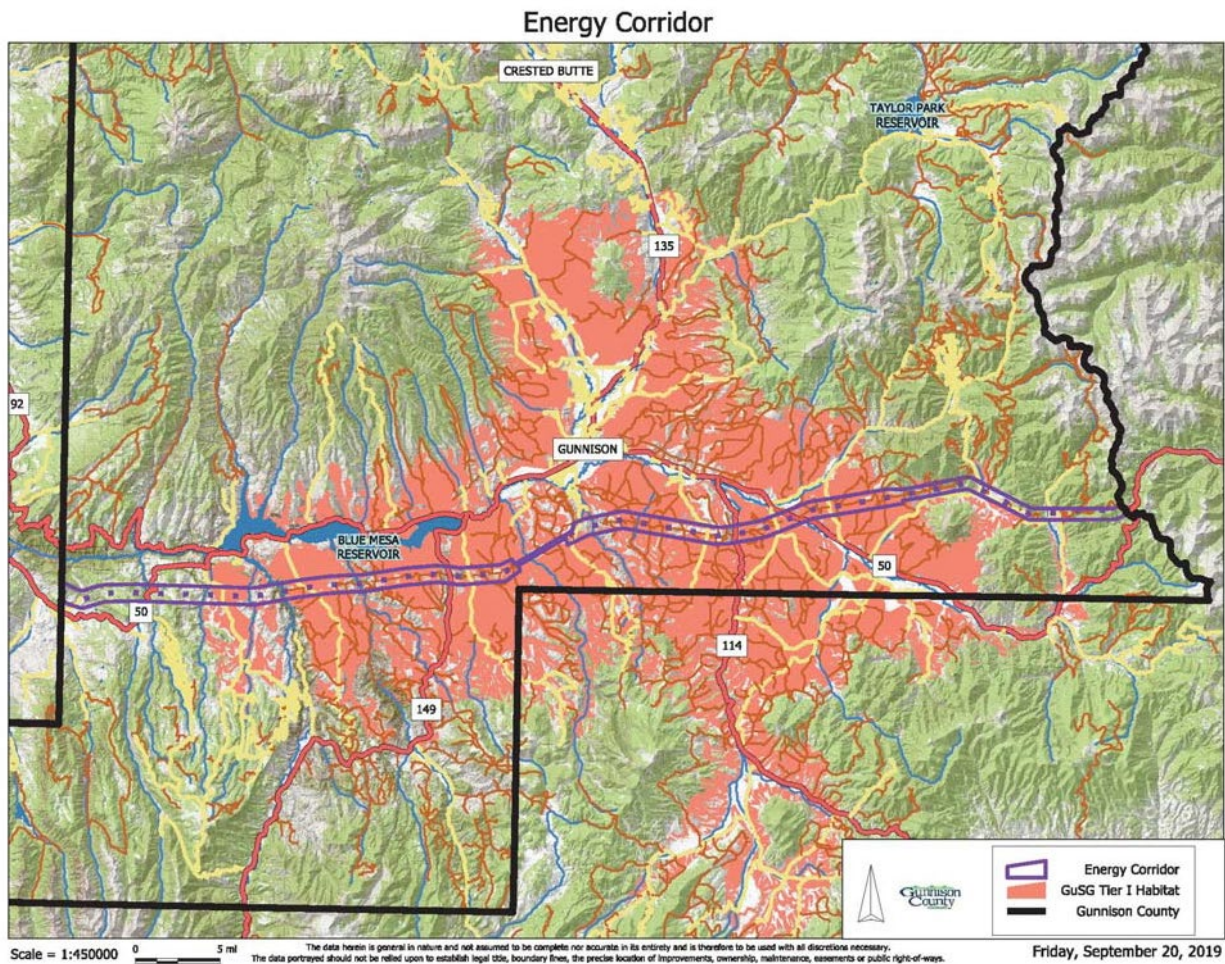
1. Areas within 300 ft of a house point (GIS location) = -5
2. Areas where there are 3 house points within 1000 ft (of each other) = -20
3. <150 ft from the centerline of an improved road = -4
4. <50 ft from the centerline of a double track = -3
5. <25 ft from the centerline of a single track (trail) = -2
6. <25 ft from the centerline of a closed route = 0
7. 0 to 820 ft from an above ground transmission powerline (WAPA) (the line that centers the Energy Corridor) = -3
8. 820 ft to 1,640 ft from an above ground transmission powerline (WAPA) (-1)
9. 4,920 ft to 6,560 ft from an above ground transmission powerline (WAPA) = 0
10. 150 ft to 450 ft from GCEA above ground distribution powerline = -1
11. <150 ft from a GCEA above ground distribution powerline = (-2)
12. Landfill boundary = -30
13. <500 ft from the landfill boundary = -30
14. UMTRA site = -30
15. Gunnison County Airport = -30

16. Large areas of open water = -30 (Blue Mesa Reservoir)

17. Large historic gravel pits = -30

It must be noted that the proposed corridor follows the route of an existing WAPA electric transmission line. An example score for a location in summer habitat, near a lek and along existing WAPA powerline with a double track road under it, would be: $+15 +15 -3 -3 = 24$. It would still be Tier 1 habitat unless further “impacts” were introduced.

Please see the following illustrative map:



E. Gunnison Sage-grouse Habitat Prioritization Tool, 2018 Update.

The document titled “Gunnison Sage-grouse Habitat Prioritization Tool, 2018 Update,” attached hereto as Appendix B, provides a spatial model that can be used on the broad scale of the Review for planning and rough habitat assessment; any further consideration of projects and development would require onsite assessment on a project-by-project basis. It is important to note that this model was developed through collaborative efforts of the Gunnison Basin Sage-grouse Strategic Committee with specific guidance from Gunnison County, the U.S. Fish and Wildlife Service, the U.S. Bureau of Land Management, the U.S. Forest Service, Colorado Parks and Wildlife, the U.S. National Park Service, the Natural Resources Conservation Service, the Gunnison Conservation District, and other interested stakeholders. Of significance, Appendix B notes, on P. 9, “Power lines pose a potential risk for habitat degradation due to predation and fragmentation. There is a significant distinction between WAPA lines and Gunnison County Electric Association (“GCEA”) lines. WAPA lines do have large structures, high lines, and improved road associated with them. GCEA lines are smaller primary and secondary lines that usually do not have roads associated with them.” And, “Exponential decay out to about 2.5 km is more probably the direct influence of power lines. This would reflect the impact of predation on the grouse, from perching predators. (Aldridge, 2011b.)”

F. Academic Research.

Two recent and significant research papers provide additional concern regarding the corridor vis-à-vis GuSG; both papers are the type of new information requested by the Agency.

1. Kohl MT, Messmer TA, Crabb BA, Guttery MR, Dahlgren DK, Larson RT, et al. (2019) The effects of electric power lines on the breeding ecology of greater sage-grouse. PLoS One

14(1) – e 0209968. <https://doi.org/10.1371/journal.pone.0209968>. (Attached hereto as Appendix C.)

In greatly condensed summary, the paper concludes that anthropogenic infrastructure can negatively affect wildlife through direct mortality and/or displacement behaviors. Some tetranoids (grouse spp.) species are particularly vulnerable to tall anthropogenic structures because they evolved in ecosystems void of vertical structures. The paper recommends a hierarchical approach for avoiding and minimizing the potential impacts of power lines on sage-grouse. New transmission power lines should be placed in existing utility or transportation corridors where feasible.¹

2. Lebeau, C., Smith K., Holloran, M., Beck, J., Kaufman, M., Johnson, G., Greater Sage-Grouse Habitat Function Relative to 230-kV Transmission Lines. The Journal of Wildlife Management 1-14; 2019; DOI: 10.1002 (Attached hereto as Appendix D.)

In greatly condensed summary, the paper concludes that the effect of transmission lines on habitat function extended 1.0 km from a transmission line in habitats within 3.1 km of an occupied lek compared to 0.50 km from a transmission line in habitats beyond 3.1 km from occupied leks. The paper suggests that future power line placement relative to GuSG nesting, brood-rearing, and summer habitats consider potential effects GuSG habitat selection and demography, and that effects can be minimized by incorporating design features that discourage avian predator perching and siting power lines on habitats with lower suitability and in habitats beyond 3.1 km from occupied leks.

¹ The initial Regional Review recognized a “de facto” pipeline corridor adjacent to State Highway 50. This was not addressed in the current Review.

G. Potential Partial Solution.

The U.S. Fish and Wildlife Service is urging local electric utilities to bury their distribution lines. Following this logic, and applying a cascading rubric of avoid, then minimize, then remediate, there ought be a requirement that – when transmission lines, other utilities and infrastructure can be located to not impact GuSG, they should be so located. When these elements must of necessity be located in the corridor, to require those components should be required to be buried.

H. Water-Body Crossings

The Section 368 Energy Corridor Regional Reviews – Region 2, dated May, 2018, notes regarding Water Body Crossings:

The proposed corridor crosses at least the following water bodies in Gunnison County:

- Tomichi Creek
- Cochetopa Creek
- South Beaver Creek
- Willow Creek
- Cebolla Creek
- Big Blue Creek

The corridor has consequences to these water bodies and their tributaries, as well as downstream impacts to the waters of the Curecanti NRA and Black Canyon of the Gunnison River.

The Review provides only the following scant analysis: “1. Projects proposed in the corridor would be reviewed during their ROW application review process and would adhere to Federal laws, regulations, and policy.” And, “2. Confirm existing corridor best meets siting principles.” This analysis should be performed – now – at the programmatic state – rather than deferred to a later state when fundamental decisions already have been made.

I. Stubbs Gulch

The Section 368 Energy Corridor Regional Reviews – Region 2, dated May, 2018, notes regarding Stubbs Gulch:

“There is an opportunity to shift the corridor to avoid or minimize the intersections with lands with wilderness characteristics. (2)”

Gunnison County requests the corridor be so shifted.

J. Skiff Milkvetch

The Section 368 Energy Corridor Regional Reviews – Region 2, dated May, 2018, notes regarding Skiff Milkvetch:

“Agency Input: in the Gunnison FO RMP, the South Beaver Creek ACEC was designated to protect the Skiff Milkvetch. The species occurs as small, scattered colonies throughout the ACEC and surrounding areas, which is the only place in the world this plant is known to occur. Colonies are typically on southeast to southwest exposures, although surveys from the past several years have found them on flats near existing colonies.”

The Review further notes:

“The corridor width is 1,000 ft in Gunnison FO because of the presence of Skiff Milkvetch. The RMP states that ROW development is allowed throughout the ACEC provided surface disturbance does not impair or degrade colonies of the Skiff Milkvetch. Appropriate mitigation would be required on all ROWs involving surface disturbing activities. The Gunnison FO typically conducts inventories for this plant in proposed project areas and relocates new disturbances to areas where there is no Skiff Milkvetch. Inventory would be done as part of the ROW application process. (1)”

In the same manner that the corridor should be shifted to minimize intersections with lands with wilderness characteristics, it should be shifted – now – to avoid Skiff Milkvetch.

K. South Beaver Creek ACEC

The Section 368 Corridor Regional Review – Region 2, dated May 2018, notes the following regarding the South Beaver Creek ACEC, ID # 87-277:

“The Agencies must use a consistent approach that makes clear commitments to addressing intersections with ACECs and other special designations and provides details on opportunities to do so through corridor revisions.” That Review continues: “The Gunnison RMP specifically allows ROWs through the South Beaver Creek ACEC ‘provided surface disturbance does not impair or degrade colonies of Skiff Milkvetch’ and that on-the-ground inventories are done and appropriate mitigations are applied. ROWs will be authorized on a case-by-case basis when exclusion and avoidance criteria are satisfied and protective stipulations are in place. Further analysis is not a consideration for corridor-level planning.”

Gunnison County strongly disagrees that the Gunnison RMP was the appropriate analytic document – or that Gunnison RMP was the appropriate regulatory mechanism – to preapprove a

corridor up to a mile wide crossing the entire width of Gunnison County, including the South Beaver Creek ACEC. This inappropriate use of the Gunnison RMP to avoid the necessary analysis and mechanisms is logically – and legally – unsupportable.

L. Western Yellow-billed Cuckoo (ESA-listed: threatened)

The Section 368 Energy Corridor Regional Reviews – Region 2, dated May, 2018, notes regarding Western Yellow-billed Cuckoo:

“Agency Input: Western Yellow-billed Cuckoo identified by BLM CO as an issue for this corridor. Comment on abstract: unspecified number of miles through Western Yellow-billed Cuckoo proposed critical habitat.”

The Review further notes:

“The corridor location within Western Yellow-billed Cuckoo proposed critical habitat is not easily resolved or avoided by corridor-level planning because alternate routes may still require siting through the proposed critical habitat. Further analysis to determine the presence of the Western Yellow-billed Cuckoo and its proposed critical habitat within the area would be required prior to authorizing development in the corridor.”

Gunnison County proposes that now – not later – is the time to perform this analysis.

III. CONSERVATION EASEMENTS

Regarding non-federal lands, as specified by Section 368, the federal energy corridors would be designated only on federal land. Project proponents that would use the corridors would need to identify the preferred project – specific route across and plan for gaining access to private lands. Project applicants would need to secure access on private and non-federal lands in

the same manner that they currently obtain access on those lands (i.e. negotiation, condemnation) independent of the federal corridor designations. The Section 368 Energy Corridor Regional Reviews – Region 2, dated May, 2018, notes regarding conservation easements:

“Comment on abstract: corridor crosses private lands encumbered by conservation easements or CPW-owned properties, which are managed for wildlife, wildlife related recreation, and other recreational uses. In many instances, corridor development would be incompatible with the purpose for which those properties are managed. Recommend avoiding CPW properties for corridor alignments, otherwise close pre-planning and coordination with CPW staff would be required. In instances where an easement prohibits corridor development and avoidance of the parcel is not possible, and the exercise of Eminent Domain may result, then the lost conservation values due to corridor development must be compensated for and replaced.” The Review further notes: “BLM can only authorize land uses on public land. Any gaps between public land within a new proposal would have to be coordinated with those landowners/managers. Since the corridor is centered on the existing WAPA ROW/easement, additional uses may be compatible within that footprint, depending on how the conservation easements and the WAPA easements across non-BLM managed lands are written.” A number of conservation easements on private lands in the Gunnison Basin are crossed by the corridor. These conservation easements require the owner of the real property to maintain existing conservation easement values and to not place (or allow to be placed) new structures that are not compatible with the conservation easement values. Elimination by the federal government of those easements because of the identification of the corridor or activity on the corridor might, of necessity, require condemnation and compensation.

The following is an illustrative – and perhaps incomplete – identification of those existing conservation easements within or touching the corridor:

ID	NAME	TRANSDATE	Acreage in energy corridor	LEGAL
208720...	Four-Mile Gulch	12/7/1999	169.1	498583
208720...	Four-Mile Gulch	12/7/1999	232.0	498583
208720...	Peterson Ranches	1/6/1999	204.8	490030
208720...	Peterson Ranches	1/6/1999	88.0	490030
208720...	Phelps Ranch I Upper Meadow	9/29/1998	125.4	487412,564389
208720...	Lypps	6/30/2006	273.4	566576,569082
208720...	Dallas A. Collins	9/12/2007	125.3	578716

It must be noted that, with 134 other private parcels impacted by the potential corridor, there are likely implications to future conservation easements as well. The implications of the potential corridor to existing and future conservation easements – and the loss of conservation values – requires further analysis.

IV. SOILS AND NATURAL HAZARDS

There are numerous areas along the proposed corridor that are not realistically suitable for buried energy transmission facilities (e.g. extensive rock, topographic features).

In addition, the corridor may cross some or all of the soils and natural hazards in the list below.

Alluvial land
Alluvial land, wet
Big Blue loam, 0 to 1 percent slopes
Cryolls-Cryaquolls association, 0 to 15 percent slopes
Dewville loam, 5 to 15 percent slopes
Duffson-Corpening loams, 5 to 35 percent slopes
Duffson-Spring creek stony loams, 5 to 40 percent slopes
Evanston loam, 5 to 20 percent slopes
Gas Creek sandy loam, 0 to 1 percent slopes
Gold Creek silty clay loam, 0 to 5 percent slopes
Goosepeak gravelly loam, cool, 20 to 65 percent slopes
Herbman very gravelly sandy loam, 25 to 65 percent slopes
Herbman, moist-Kismuth complex, 25 to 65 percent slopes
Irim loam, 0 to 1 percent slopes
Kezar-Cathedral gravelly sandy loams, 5 to 35 percent slopes
Kubler loam, 5 to 35 percent slopes
Lucky-Cheadle gravelly sandy loams, 5 to 45 percent slopes
Moran-Telluride-Rock outcrop complex, 5 to 40 percent slopes, extremely stony
Ohman-Perfecto complex, 25 to 65 percent slopes
Parlin-Hopkins channery loams, 5 to 45 percent slopes
Parlin-Mergel gravelly loams, 5 to 45 percent slopes
Perfecto-Ohman-Legault complex, 25 to 65 percent slopes, very bouldery
Quander, cool-Bushpark-Rock outcrop complex, 15 to 45 percent slopes
Rock outcrop
Ruby gravelly sandy loam, 5 to 30 percent slopes
Shule and sapinero loams, 10 to 50 percent slopes
Stony rock land
Storm family very cobbly sandy clay loam, 10 to 65 percent slopes
Tellura very gravelly clay loam, dry, 15 to 65 percent slopes, very bouldery
Tellura, moist-Quander complex, 5 to 25 percent slopes
Uinta and tolvar soils, 10 to 50 percent slopes
Vanwirt-Storm complex, 5 to 40 percent slopes
Vulcan gravelly sandy loam, 10 to 35 percent slopes
Water
Youman-Leaps loams, 5 to 35 percent slopes
Youman-Passar loams, 5 to 30 percent slopes

Further analysis is required of the consequences of construction, installation, maintenance and emergency responses required in those soils and natural hazard areas in the corridor.

V. WIDTH OF CORRIDOR

It appears that the width of the corridor ranges from 1,000 feet (near Hartman Rocks to avoid consequences to Skiff Milkvetch) to 5,280 feet for the remainder of the route through the Gunnison Basin.

Gunnison County requests further analysis to determine the minimum necessary width required to accomplish the functions for which the corridor is intended.

VI. OTHER.

A. There are two proposed revisions for the 87-277 Corridor (Review, P. 25):

1. Consideration of shifting the corridor south between MP5 and MP43 (south is not good for GuSG) and narrowing or shifting the corridor between MP 103 and MP 115 to avoid lands with wilderness characteristics.

2. Consideration of shifting the corridor slightly to avoid overlap with roadless areas and to avoid overlap with the active geothermal lease. Gunnison County requests that, although no specific revision has been identified, there should be further consideration of alternate routes to avoid or minimize impacts on GuSG and the species' habitat. While Gunnison County commits to work with the Agency, the onus to initiate this process is on the Agency.

B. The "minimum specifications" for "corridor management" (Review, P. 31) lacks the detail needed to administer Section 368 energy corridors effectively in terms of corridor utilization and resource protection. Again, while Gunnison County commits to work with the agency, the onus to initiate this process is on the agency.

C. Interagency Operating Procedures ("IOP's") (Review, P. 32) emphasizes "wildlife migration corridors", though it does also mention "habitat" as a "potential" new IOP. This requires significant further consideration.

D. Regarding Greater sage-grouse habitat, the Review, Exhibit, P.23 suggests consideration of re-aligning a corridor to "avoid" Greater sage-grouse habitat. If such consideration is appropriate for a species not listed under the Endangered Species Act, it ought be mandatory for a species that is listed.

E. There is no discussion of private lands specific to corridor 87-277. The Review does list a "potential corridor deletion" for Corridor 130-274 in Colorado in part to "... minimize potential impacts on conservation easements on private land to protect GuSG..." Apparently, Corridor 130-274 is an "...isolate parcel that does not promote efficient use of the landscape or maximize utility." Further review must be provided regarding conservation easements in the Gunnison Basin.

Thank you for your consideration. Again, Gunnison County makes available to the Agency, its staff.

BOARD OF COUNTY COMMISSIONERS of GUNNISON COUNTY, COLORADO by:



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Section 368 Energy Corridor Review, Regions 2 and 3

Appendix Index

Appendix A	Gunnison County Comment Letter, 2/23/2018.
Appendix B	Habit Prioritization Tool; Gunnison Sage-grouse, 2018 Update.
Appendix C	Effects of electric power lines on the breeding ecology of greater sage-grouse.
Appendix D	Greater Sage-Grouse Habitat Function Relative to 230-kV Transmission Lines.



Gunnison County Board of County Commissioners

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February 23, 2018

U.S. Department of Energy
U.S. Department of Interior
U.S. Forest Service

Re: West-Wide Energy Corridors Regional Review: Section 368 Stakeholder Input

Dear Agencies:

The Board of County Commissioners of the County of Gunnison, Colorado ("Gunnison County Commissioners") submit the following "Section 368 Stakeholder Input" regarding Corridor 87-277, and in particular, the "*Western Portion of Corridor 87-277*". The Gunnison County Commissioners commit to participate in this Stakeholder Input Process and Resultant Processes, and reserve their right to make further comments and to participate fully in each available component of the processes of the U.S. Department of Energy, the U.S. Department of the Interior and the U.S. Forest Service regarding these matters.

The Gunnison County Commissioners have a unique perspective that informs their comments:

A. First, the Gunnison County Commissioners have the authority to protect and promote the public health, safety and welfare of the people of Gunnison County, and the authority to regulate land use planning and environmental quality and protection (including site selection and construction of major facilities of public utilities) in Gunnison County, Colorado. Pursuant to these authorities, the Gunnison County Commissioners have duly adopted policies and regulations including the review, approval, conditioning or denial of proposed activities and uses of land and natural resources that reasonably may be implicated by the *Western Portion of Corridor 87-277*. In particular, C.R.S. § 24-65.1-101 *et seq.*, the Areas and Activities of State Interest Act ("AP.ASIA" or "HB 104'1"), authorizes Gunnison County to designate and then regulate certain activities or areas of state interest through a permitting process established by the County. These areas include "site selection and construction of major public utility facilities", which is defined as central office buildings of telephone utilities; transmission lines, power plants, and substations of electrical activities; and pipelines and storage areas of utilities providing natural gas or other petroleum derivatives." See C.R.S. §24-65.1-104(8). Gunnison County has designated these matters of state interest and instituted a permitting system, which would necessarily include any such public utility facilities in Corridor 87-277 passing through Gunnison County.

B. Second, the Gunnison County Commissioners consistently have provided personnel, facilities and finances to implement their authorities.

C. Third, the decisions of the U.S. Department of Energy, the U.S. Department of the Interior and the U.S. Forest Service regarding the *Western Portion of Corridor 87-277* will be consequential to the citizenship and the social, economic and environmental fabric and future of the Gunnison County community, in qualities and impacts that are unique to the Gunnison County community.

For your consideration, please find the following comments regarding the *Western Portion of Corridor 87-277*:

1. Figure 1b. Page 2: The area labeled as "Chaffee County" is actually Gunnison County.
2. Figure 2b. Page 5, "Source" column: The area labeled as the "Royal Gorge Field Office" is actually within the administrative boundary of the Gunnison Field Office of BLM.
3. Table, Page 10: Poncha Springs is north of Poncha Pass. La Veta Pass is on the southeast side of the San Luis Valley. We assume you are referring to Poncha Pass not La Veta Pass.
4. Table, Page 13, "Agency Review and Analysis" column: There are no Greater sage-grouse in the Gunnison Basin (here specifically MP 77 to MP86). We assume you are referring to Gunnison sage-grouse (GuSG) critical habitat. We also note that in the area noted (MP 77 to MP 86) the only direction a corridor shift would accomplish avoidance of GuSG critical habitat would be a northward shift.
5. Table, Page 14, "Agency Review and Analysis" column: We recognize that the entire corridor within the Gunnison Basin is located within U.S. Fish and Wildlife Service's designated GuSG critical habitat. We also note that the existing transmission line within this corridor has been identified as adversely impacting GuSG. In addition to the impacts of the towers and lines themselves, corridor maintenance practices/results have been identified as fragmenting GuSG habitat. Gunnison County recommends a review of all maintenance and repair practices to reduce impacts. We also believe that conformance with the Gunnison Basin Gunnison sage-grouse Conservation Agreement on Federal Lands is a mandatory part of all corridor practices in the Gunnison Basin.
6. Table, Page 14, "Agency Review and Analysis" column: We note that the USFS GMUG National Forest is in the process of a Forest Plan Revision which may impact this corridor. Also, the BLM GuSG Draft RMP amendment is still under consideration and once finalized, may also impact this corridor. The "exclusion" of Section 368 energy corridors from ROW exclusion areas is by no means a "done deal".

7. The corridor passes directly over the historic Aberdeen quarry (granite used in State Capitol building), which is a locally designated landmark.
<http://gunnisoncounty.org/785/Historic-Sites#Aberdeen>
8. The corridor analysis document on page 20 states that the corridor does not cross the North Branch of the Old Spanish Trail (National designated historic trail), but on page 22 the analysis document states that the corridor does cross the Trail. We believe it does cross the Trail at least 2 times in Gunnison County but not on federal land.
9. The *Western Portion of Corridor 87-277* crosses significant water bodies including Tomichi Creek and Cochetopa Creek. Particular attention is required to avoid immediate, on-site consequences to these water bodies and their tributaries, as well as downstream impacts to the waters in the Curecanti National Recreation Area and Black Canyon of the Gunnison River.
10. The "Corridor Rationale" states that "(a)ny new pipelines would likely follow along U.S. Highway 50; there is one existing gas pipeline that roughly follows U.S. Highway 50 east of Gunnison." Adoption of this rationale ought not to be assumed to be an accomplished fact without considerable evaluation of the impacts to private properties, lands subject to conservation easements, water bodies, agricultural and cultural lands adjacent to Highway 50, the Gunnison County Landfill, a Federal Uranium Mill Tailings Radiation Control Act disposal and long-term stabilization site, and the Coldharbour Institute, a community supported nonprofit that facilitates education, incubation and demonstration of responsible personal, community and land practices, located near the intersection of Highway 50 and Highway 114, where a substantial federal wetland reserve is located.

We appreciate your consideration.

Thank you.

Respectfully submitted,

THE BOARD OF COUNTY COMMISSIONERS
OF THE COUNTY OF GUNNISON, COLORADO

By:



David Baumgarten,
Gunnison County Attorney

Gunnison Sage-grouse Habitat Prioritization Tool

2018 Update Documentation



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The below listed information was incorporated into a spatial model to evaluate habitat within the Gunnison Basin for Gunnison sage-grouse. The spatial model in itself can only be used on a broad scale for planning and rough habitat assessment. Projects and development will still need to be evaluated with an onsite assessment on a project-by-project basis.

This updated version of the model sought to update data and spatial layers to ensure the best, most-current science and knowledge was used in the prioritization of Gunnison sage-grouse habitat within the Gunnison Basin.

Address why this model only covers occupied critical habitat and not all critical habitat. The Habitat Prioritization Tool only addresses Gunnison Sage-grouse occupied habitat. Unoccupied habitat within USFWS designated critical habitat was not addressed because of discrepancies in soil types, necessity of significant habitat modifications to make it actually usable by GuSG, and other issues. The importance of prioritizing habitat where the species actually exists was determined to be of paramount importance.

This model has been developed through collaborative efforts of the Gunnison Basin Sage-grouse Strategic Committee with specific guidance from Gunnison County, US Fish and Wildlife Service (USFWS), Bureau of Land Management (BLM), US Forest Service (USFS), Colorado Parks and Wildlife (CPW), National Park Service (NPS), Natural Resources Conservation Service (NRCS), Gunnison Conservation District and interested stakeholders. This model incorporates the most recent information providing a representation of potential on the ground habitat conditions in the Gunnison Basin. Data included is the best information available at the time. Future updates will be essential when new and better data is available.

1. HABITAT POTENTIAL

Gunnison sage-grouse habitat potential was evaluated within the CPW Occupied Habitat boundary for the Gunnison Basin population. This mapped layer is updated frequently and this tool currently uses data from 2015 with slight modification to include areas around Blue Mesa reservoir down to the high water line. All land within the outer boundary is evaluated. This layer is slightly different than the habitat polygon delineated in the Federal Register. Potential and vacant/unknown habitats are not included in scoring because of lack of habitat and geospatial data. Vacant/Unknown habitat is apparently high quality habitat without birds. Potential habitat would require a significant amount of time, energy and resources to create to a habitat of sufficient quality that could be colonized by grouse.

This tool evaluates the habitat potential as a sum of the weighted scores assigned to each habitat layers in combination with perceived impacts (uncontrollable threats.) This score is the foundation for assigning habitat statuses (Tier 1 and Tier 2). The goal of this valuation is to decrease future habitat fragmentation and to increase the ability for conservation planning. Tier 1 habitat is defined as those habitats scoring 15 or higher. Tier 2 habitats are all other habitats (<15).

1.1 HABITAT

Lek: The official lek status and high male count are defined and reported from lekking data collected and published by CPW in their annual Gunnison Basin Lek Count Summary and Population Estimate. The Official Status of a lek is given as a cumulative status and designated as Active, Historic, Inactive, or Unknown. To be Officially Active, a lek only needs to be designated as Active in the current year. A lek is not considered Officially Inactive unless it has been seasonally Inactive for five consecutive years. Thus, a lek might not have any birds for a given season, but its official status may be Unknown because the lek had not been Inactive all of the past five years. Historical lek status is not given until a lek has been Inactive for 10 consecutive years. (Jackson and Seward, 2011)

- **Geospatial Data:** This layer is the CPW lek polygon layer and includes a 0.6 mile buffer from the outside edge of the lek polygon with spatial boundaries from the 2014 unofficial update as well as the local status from 2016. Buffering the lek polygons by 0.6 miles matches up with the disturbance guidelines in the Rangewide Conservation Plan. This 0.6 mile buffer serves as a measure of protection to ensure that the entire lek polygon is captured within the buffer polygon and that potential direct or indirect impacts directly adjacent to a lek that could influence lekking behavior are evaluated.
- **Evaluation class breaks (weight) justification:** Leks are considered important habitat for the grouse. Habitat alteration on or near a lek has the potential to have a great impact to the population. There is a need to conserve all leks, regardless of the number of birds displaying on the lek. (Aldridge, 2011b; Phillips, 2011; Jackson and Seward, 2011.)
 - **Active** (15) *Active leks are those of greatest value to the grouse population. Birds are displaying regularly on an annual basis.*
 - **Unknown** (10) *These leks could have and Official Status of unknown for many reasons, including missing count data. Leks can fall into this category in a one year time frame.*
 - **Inactive** (8) *These leks should not be completely discounted. There is potential for the grouse to comeback and begin using these areas on a regular basis if numbers increase or surrounding habitat improves. It takes 5 years for a lek to move into this category.*
 - **Historic** (1) *The majority of these leks are close to high build-out densities and will probably never be able to recover to active status regularly. The lek would have been inactive for 10 years or greater.*
- **Data for support:**
 - 2015 Gunnison Basin Gunnison sage-grouse Lek Count Summary and Population Estimate Final Report (Jackson and Seward, 2015).
 - 2011 Gunnison Basin Gunnison Sage-grouse Lek Count Summary and Population Estimate Final Report (Jackson and Seward, 2011).
 - 2011. Seward, Nate. Lek Status Definitions.
 - 2011b. Aldridge, Cam. Public meeting information, December 1, 2011. Meeting to validate the priority tool model called by the Technical Subcommittee for the Gunnison Basin Strategic Committee for the Gunnison Sage-grouse.
 - 2011. Phillips, Mike. Public meeting information, December 1, 2011. Meeting to validate the priority tool model called by the Technical Subcommittee for the Gunnison Basin Strategic Committee for the Gunnison Sage-grouse.
 - *Endangered and Threatened Wildlife and Plants: Critical Habitat for Gunnison Sage-Grouse; Final Rule, 79 Fed. Reg. 69312 (November 20, 2014)*
- **Area for improvement:**
 - The Local CPW Office GuSG Annual Report definitions do not align with the RCP or current Statewide definitions for Official Lek Status as defined by Colorado Parks and Wildlife. Local CPW staff has maintained consistency in local definitions and is working to align them with the RCP and Statewide definitions.

Brood Rearing Habitat: Brood rearing habitat is defined in the Rangewide Conservation Plan (RCP). It includes mesic areas (swales, meadows, sagebrush near irrigation ditches and irrigated meadows) with lush vegetation.

- **Geospatial Data:** This layer was updated extensively in the Version 2 model. A 10m DEM slope assessment was completed to find all drainages and draws. This layer was then combined with the NHD Stream Layer and ditch layers to capture more brood rearing habitat. Using a cost analysis which incorporated slope, the group was then able to create a varied width representing the actual floodplain and thus the brood habitat. The model also incorporated the wet meadow/sagebrush interface and all Aw (alluvial) soils. Areas within lakes and irrigated areas outside the 50m of ditches were removed from the Brood layer. Lastly areas outside of nesting/summer/fall/winter habitat but within the occupied habitat boundary were removed from this layer. The modifications to this layer tried to improve upon the general 50m buffer provided for in the Gunnison Basin Local Plan by incorporating varying relief and differences in width in these floodplain areas. Some areas may be wider than 50m while other are less.

- **Evaluation class breaks (weight) justification:**
 - o Present (13)

- **Data for support:**
 - o The Nature Conservancy: Gunnison Basin Mesic area project prioritization model, 2017
 - o Gunnison Sage-grouse Rangewide Conservation Plan
 - o Gunnison Basin- Colorado. 1997. Local species management plan.
 - o USFWS Federal Register Critical Habitat
 - o CPW streams layer

- **Area for improvement:**
 - o Removal of any brood rearing habitat from heavily treed areas, and open water.
 - o There is a need to add other features including springs and seeps that are not captured in the current data layers.

Nesting/Summer/Fall/Winter Habitat: These habitats are defined in the RCP and in the Federal Register for Critical Habitat and includes sagebrush dominated areas.

- **Geospatial Data:** This data layer was compiled from NRCS soils data and includes all sagebrush dominated range sites (mountain loam, subalpine loam, mountain outwash, dry mountain loam, dry exposure and deep clay loam) and stony rock areas. *See Appendix X for soils included from each Soil Survey.* Brood and irrigated layers were removed from this layer.

- **Evaluation class breaks (weight) justification:** As we looked at the map the group decided to differentiate nesting habitats based on proximity to brood rearing habitat-- nesting habitat closer to the brood rearing habitat would receive a higher score. Sage grouse hens have to be able to move their broods from the nests to brood rearing habitat by walking. All nesting habitat is of value, but nesting habitat closer to brood rearing habitat has potential to be of higher value. All nesting habitat within 4 miles of a lek is accounted for in the model (Connelly et al 2000, Aldridge 2011b).
 - o Present <750 ft from brood rearing and winter habitat (15)
 - o Present >750 ft from brood rearing and winter habitat (10)

- **Data for support:**
 - o Gunnison Sage-grouse Rangewide Conservation Plan; Gunnison Basin- Colorado. 1997. Local species management plan.
 - o NRCS Soil Surveys—See Appendix X
 - o 2011b. Aldridge, Cam. Public meeting information, December 1, 2011. Meeting to validate the priority tool model called by the Technical Subcommittee for the Gunnison Basin Strategic Committee for the Gunnison Sage-grouse.
 - o Connelly et. al 2000

- 2011. Phillips, Mike. Public meeting information, December 1, 2011. Meeting to validate the priority tool model called by the Technical Subcommittee for the Gunnison Basin Strategic Committee for the Gunnison Sage-grouse.

- **Area for improvement:**

- Updated NRCS soils mapping and ecological site mapping.

- **Critical Winter Habitat:** Gunnison Sage-grouse Rangewide Conservation Plan; Gunnison Basin- Colorado. 1997. Local species management plan. This layer was not included in the HPT because defining data was not available.

- **Area for improvement::**

- There is a need to define these areas spatially, but the group does not have the tools/data necessary at this point.

-

Land Near Active Leks: Land near active leks is considered a higher priority for preservation. Leks are often in close proximity to quality nesting habitat. (Connelly et al. 2000; Aldridge et al. 2011) The Local Gunnison Sage-grouse Conservation Plan notes that these areas are priority areas used by nesting hens (1997).

- **Geospatial Data:** A two mile buffer was placed around the outer edge of the 2017 CPW lek polygon layer. Both the area within the 2 mile buffer and the lek itself were included in this layer. Irrigated areas were removed from this layer. The two mile buffer is from the Gunnison Sage-grouse Rangewide Conservation Plan (1997).

- **Evaluation class breaks (weight) justification:**

- Areas within active leks and < 2 miles from the edge of the active leks (5)

- **Data for support:**

- Connelly, J.W., M.A. Schroeder, A.R. Sands and C.E. Braun. 2000. Guidelines to manage sage grouse populations and their habitat. Wildlife Society Bulletin 28:967-985.
- Aldridge et al. 2011
- Gunnison Sage-grouse Rangewide Conservation Plan; Gunnison Basin- Colorado. 1997. Local species management plan.

Irrigated Lands: Irrigated areas greater than 50m from the sagebrush interface and outside CPW lek polygons are not considered as suitable grouse habitat.

- **Geospatial Data:** This is a spatial layer of irrigated meadows where the inside of the polygon greater than 50m from the sagebrush was scored to reduce the value of the habitat as indicated in the RCP and Federal Register. If this area happened to coincide with a lek polygon, the value was not removed (the higher score was kept). Irrigated areas within brood habitat were removed from this layer.

- **Evaluation class break (weight) justification:**

- Present (1)

- **Data for support:**

- Gunnison Sage-grouse Rangewide Conservation Plan; Gunnison Basin- Colorado. 1997. Local species management plan.

- *Endangered and Threatened Wildlife and Plants: Threatened Status for Gunnison Sage-Grouse; Final Rule*, 79 Fed. Reg. 69192 (November 20, 2014)
- 2011. Phillips, Mike. Public meeting information, December 1, 2011. Meeting to validate the priority tool model called by the Technical Subcommittee for the Gunnison Basin Strategic Committee for the Gunnison Sage-grouse.

Tree Canopies: Trees are not typically present in grouse habitat, not only do they reduce desired vegetation by the grouse, they also increase the risk of predation. This is not a specific layer in the HPT. It is somewhat defined by the forested soils layer.

1.2 Impacts

Subdivisions: Areas divided by subdivision and development have greater impacts on grouse habitat.

- **Geospatial Data:** Gunnison and Saguache County's parcel layers, as well as their 9-1-1 house point layers, have been combined to determine development potential/impact. Development was defined as home, barn, or any improvement valued at more than \$30,000 on a parcel. At each house point, there was a 300 foot radius buffer added to the known structure. House points that were within 1000 ft of another two house points were then buffered by 1000 ft due to the increased impact on the grouse. (Cochran, 2011) The 300 ft buffered housing points buffer was clipped and removed from the 1000 ft buffer so that points did not receive a negative score for both the buffers. Parcel and house point data is from 2017 updates for both counties.
- **Evaluation class break (weight) justification:**
 - Areas within 300ft of a house point (-5) *Areas adjacent to houses are not suited for grouse habitation.*
 - Areas where a 3 house points are within 1000 ft (-20) *Areas where more house points are located closer together (subdivisions) will have an even greater negative impact on the grouse habitat.*
- **Data for support:**
 - Cochran, Jim. 2011. Personal communication.
 - Phillips, Mike. 2011. Personal communication.

Roads and Trails: All roads and improved trails were evaluated for their impact to the habitat from fragmentation and predator corridors. **Use and recreation impacts from disturbance are not considered in this layer. This is a habitat impact evaluation of the roads themselves.** Improved roads are considered all roads bigger than all season, 2-wheel drive roads. Improved roads are defined as passenger car roads, highways, and improved county roads. Double track roads are considered unimproved roads and include: admin routes, jeep trails, primitive roads, high clearance roads, private roads, and ATV routes. Single track routes are considered trails (mechanized and motorized are included). Closed routes are routes that are permanently closed (not seasonally) that have not been reclaimed.

- **Geospatial Data:** Road data from the county, CPW, BLM, NPS and USFS were used to create this layer. Data included is from 2017 and the 2010 USFS/ BLM Travel Management Plan
- **Evaluation class break (weight) justification:**
 - <150 ft from the centerline of an improved road (-4) *These roads are defined as passenger car roads, highways, and county roads.*
 - <50 ft from centerline of a double track(-3) *These roads are defined as roads with vegetation growing between the tracks and include admin routes, jeep trails, primitive roads, private roads (driveways), unmaintained roads, and ATV routes.*
 - <25 ft from that center line of a single track (-2) *These are defined as smaller disturbances that include trails, including both mechanized and motorized uses.*
 - <25 ft from that center line of a closed route (0) *These are defined as routes that are permanently closed (not seasonally) that have not been reclaimed.*
- **Data for support:**
 - Aldridge et al. 2010- Aldridge does not agree with the 150ft buffer. He feels that improved roads can impact nesting habitat up to 8km away. Double track roads can have an impact to over 6 km away. He feels that there is not a non-linear response as you move away from the road and that a regression model needs to be used to depict this.

- *2010 Gunnison Basin USFS and BLM Federal Travel Management Plan*

- **Area for improvement:**

- Winter use trails and roads should be incorporated when information is available
- Reclaimed roads and trails should be incorporated

Power Lines: Power lines pose a potential risk for habitat degradation due to predation and fragmentation. There is a significant distinction between WAPA lines and the GCEA lines. WAPA lines do have large structures, high lines, and improved roads associated with them. GCEA lines are smaller primary and secondary lines that usually do not have roads associated with them.

- **Geospatial Data:** There is a data layer available with large, above ground, WAPA transmission lines mapped.

- **Evaluation class break (weight) justification:**

- 0 to 820 ft. (0.25km) from an above-ground, transmission power line (WAPA) (-3) These lines typically have a maintained road and taller structures associated with them.
- 820 ft. to 1,640 ft. (0.25 to 0.5 km) from an above-ground, transmission power line (WAPA) (-2) These lines typically have a maintained road and taller structures associated with them.
- 1,640 ft. to 4,920 ft. (0.5 to 1.5 km) from an above-ground, transmission power line (WAPA) (-1) These lines typically have a maintained road and taller structures associated with them.
- 4,920 ft. to 6,560 ft. (1.5 to 2km) from an above-ground, transmission power line (WAPA) (0) These lines typically have a maintained road and taller structures associated with them.
- 150 ft. to 450 ft. from a GCEA above-ground, distribution power line (-1) Are typically smaller in structure and have no maintained road that accompanies them.
- <150 ft. from a GCEA above-ground, distribution power line (-2) Are typically smaller in structure and have no maintained road that accompanies them.

- **Data for support:**

- 2011. Phillips, Mike. Public meeting information, December 1, 2011. Meeting to validate the priority tool model called by the Technical Subcommittee for the Gunnison Basin Strategic Committee for the Gunnison Sage-grouse. Mike feels that an impact from power lines is for direct mortality (2 birds within the scope of his study).
- 2011b. Aldridge, Cam. Public meeting information, December 1, 2011. Meeting to validate the priority tool model called by the Technical Subcommittee for the Gunnison Basin Strategic Committee for the Gunnison Sage-grouse.
- Messmer, T. et al. 2017 Greater sage-grouse lek persistence and breeding distributions relative to electric power transmission and distribution lines

- **Area for improvement:**

- Exponential decay out to about 2.5km is more probably the direct influence of the power lines. This would reflect the impact of predation on the grouse from perching predators. (Aldridge 2011b.)

Unsuitable Habitat: There are areas within the Gunnison Basin that may have been included within CPW's occupied habitat layer that need to be removed. This layer servers to call out specific, finite areas that should not be counted as grouse habitat.

- **Geospatial Data:** The spatial information comes from aerial imagery and county parcel data.
- **Evaluation class break (weight) justification:**
 - o Landfill boundary (-30) *The Gunnison County landfill does not count as grouse habitat due to the level of disturbance, lack of appropriate vegetation and/ or subsidized predation.*
 - o <500 ft of the landfill boundary (-30) *This area still provides large subsidies for predators and reduces the quality of habitat to the grouse due to increased levels of predation.*
 - o UMTRA site (-30) *This site is the mitigated tailing location for uranium mining that has historically occurred in the valley. Currently, the area is capped with a very thick layer of coarse black rock that precludes growth of vegetation. The boundary of the rock can be seen using aerial imagery and it is not grouse habitat.*
 - o Gunnison County Airport (-30)
 - o Large areas of open water (-30)
 - o Large, historic gravel pits (-30)
- **Data for support:**
- **Area for improvement:**

2. Validation

The 2012 HPT was validated using known grouse locations by CPW. The 2018 HPT has not been validated against known grouse locations.

Model Accuracy*		
	Version 1	Version 2
Tier 1	87.75	
Tier 2	12.25	
Total	100.00	

**Number presented are the % of known bird locations accounted for within the tool.*

Scoring Reference Matrix

Habitat Potential	Evaluation Class	Weight
	active	15
	unknown	10
	inactive	8
	historic	1
Lek (0.6 mile buffer from edge of lek polygon)		
Brood Rearing Habitat within 50m of water (riparian, irrigation ditches, mt meadows, swales) and sagebrush	present	13
	< 750ft from brood rearing habitat	15
Nesting/Summer/ Fall/ Winter Habitat (sagebrush dominated ecological sites and stony rock lands)	> 750ft from brood rearing habitat	10
	lek and land <2 miles from active lek boundary	5
Land Near Active Leks (areas within 2 miles of an active lek and the lek itself)	lek and land <2 miles from active lek boundary	5
Land Near Active Leks (areas within 2 miles of an active lek and the lek itself)	lek and land <2 miles from active lek boundary	5
	Irrigated Lands (irrigated land greater than 50m from sagebrush not discounting any leks in these areas)	present

Impacts	Evaluation Class	Weight
<i>(This accounts for impacts on the habitat that will not likely be changed.)</i>		
Subdivisions (areas with development at certain densities)	within 300' of development (house)	-5
	areas with 3 housing points within 1000'	-20
Subdivisions (areas with development at certain densities)	<150ft from the centerline of improved roads	-4
	Roads and Trails (this accounts for the fragmentation impacts of the road/trail structure)	

<p>and NOT the impacts associated with the recreational use) Roads and Trails (this accounts for the fragmentation impacts of the road/trail structure and NOT the impacts associated with the recreational use)</p>	<p><50ft from the centerline of a double track roads</p>	<p>-3</p>
<p>Powerlines</p>	<p><25ft from the centerline of a single track roads</p>	<p>-2</p>
	<p><25ft from the centerline of a closed routes</p>	<p>-1</p>
	<p>0 – 820 ft from above ground transmission line (-3)</p>	<p>-3</p>
	<p>820ft – 1,640ft from above ground transmission line (-2) 1,640 – 4920 ft from above ground transmission line (-1) 4,920 – 6,560 ft from above ground transmission line (0) 150- 450ft from above ground distribution line (-1) <150ft from above ground distribution line (-2)</p>	<p>-5</p>
	<p>Landfill boundary (-30)</p>	<p>-30</p>
	<p>Unsuitable Habitat</p>	<p>< 500ft of the landfill boundary (-30)</p>
<p>UMTRA site (-30)</p>		<p>-30</p>
<p>Gunnison County Airport (-30)</p>		<p>-30</p>
<p>Open water (-30)</p>		<p>-30</p>
<p>Large, historic gravel pits (-30)</p>		<p>-30</p>

4. Mapped Acreage

Mapped Acreage			
		<i>Version 1 (2012)</i>	<i>Version 2 (2018)</i>
Lek	Active Unknown Inactive Historic		
	Brood Rearing Habitat		
	Nesting/Summer/ Fall Habitat		
	Winter Habitat		Included with Nesting/Fall
	Critical Winter Habitat	Not Evaluated	
	Land Near Active Leks		
	Irrigated Lands		
Subdivisions	< 300' of a development 3 housing points within 1000' <70 acres and developed		
Roads and Trails	<150' from improved road <50' from double-track <25' from single-track <25' from closed route		
Power Lines	<450' from GCEA line <450' from WAPA line		

6. Summary of Updates

In order to maintain the usefulness and improve the accuracy of this tool, occasional updates will be needed. It is proposed that this tool be reviewed and adjusted according to new science and spatial information. Reviews should coincide with CPW's species review for the Gunnison sage-grouse or at the request of the Gunnison sage-grouse Strategic Committee.

The major changes to the HPT are:

- Reduced the **buffer to proximity of Brood Rearing** (BR) habitat to the Nesting/ Summer/ Fall (NSF) habitat and added proximity to Winter habitat. This was to capture the idea that NSF and Winter habitat in closer proximity to brood rearing/ mesic areas has higher value.

- Drastically updated the **brood rearing habitat** to capture the floodplain versus a buffered line (increased brood rearing substantially)—based on the TNC mesic area project prioritization model created by The Nature Conservancy in their Climate Resiliency Project. This update also captured small depression areas in ephemeral drainages that might not have been captured in the first tool.
- Added missing **soil layers** (like Taylor Park Soil Survey)
- Removed the **development threat to areas greater than 70 acres**. This tended to reduce the core of high quality habitat for political reasons that is not appropriate for a habitat assessment.

Updates that were not incorporated, but may provide useful in future updates:

- **Tree stands** are not consistently removed from the habitat model. Is there a better way to capture sites that have the potential to produce trees? If so, those areas should be removed.
- **Noxious weeds** and invasive species information would be very valuable to add to the tool, but due to inconsistencies in mapping across private and public lands, it is hard to incorporate into this model. Adding this layer would also tend to indicate a permanent loss or degradation of habitat that may not actually reflect new treatment and restoration technologies.
- Consider using a view shed analysis to review implications of **powerlines** on habitat. Currently there is a gradient, but topography is not weighing in to the mapping. To complete this analysis, we would need more information like tower and wire heights.

Major Questions/ Concerns:

- Have we adequately captured grouse habitat (at nearly 60% of the basin)? Can we ground truth this again like we did in the previous model with the CPW data. (Version 1 captured >80% of the bird locations.)
- Winter habitat was combined with the nesting/summer/fall habitat. Differentiation between the two habitat types was difficult and inaccurate. A new Critical Winter Habitat layer is needed in future year updates.
 - Official lek status was updated to 2016 data provided by CPW. The lek boundary layer remains the 2012 layer.
 - The occupied habitat layer collected by CPW will be updated from the 2005 data to the 2015 data.
 - All address points (indicating development and housing) will be updated to the current available data (2017).
 - Road data is current as of 2010 for BLM, USFS, County, Municipal, State and US.
 - Unofficial Taylor Park Soil Survey data was incorporated into the model.
 - Updated power line data to include GCEA local distribution lines.
 - To simplify the geospatial layers included in the model, the 2018 model will only include scored habitat and impact layers. All other layer data will be kept for future years project analysis.
- Small sliver polygons less than 1 acre will be blended into an adjacent polygon in which it shares the largest border. Due to the model's spatial inaccuracies, the removal of these small polygons will more closely reflect the data's accuracy.
 - More information is needed to substantiate the ranking values assigned.
 - Comparative analysis of model to known grouse locations as provided by CPW and NPS needs to be done to fully understand the model's ability to capture grouse habitat suitability. Initial reviews of the original tool with on the ground assessment and preliminary data from CPW have shown good ability to capture habitat values.
 - A future update strategy needs to be created.
 - Area around Blue Mesa that was initial outside of CPW's occupied habitat layer but above the Bureau of Reclamation's high water line for the reservoir was added back in.
 - When compared to several other models that have been created specifically for the Gunnison sage-grouse, the HPT is the only one that focuses on habitat potential based upon soils and not bird tracking locations. Both Mindy Rice's (CPW) and Cam Aldridge's models (USGS) focus on resource selection which may not truly depict habitat potential, quality and distribution.

6. HPT Future Update Plan

Annual: (These updates do not require approval by the Strategic Committee unless a majority of the Committee requests review/approval of one or more of these updates. These updates will only occur if new data is available.)

House points

Lek status (including new leks identified by CPW)

Roads and trails

New roads/trails

Changed status of roads/trails (upgrades/downgrades)

Decommissioned roads/trails

Every 5 years: (These updates require recommendation by the Technical Subcommittee and approval by the full Strategic Committee. At minimum a review of the specific data/layers noted below is required by the Technical Subcommittee to determine if updates in any of these categories are necessary/appropriate.)

Lek polygons

Occupied habitat polygon

Consider any new science that may be applicable to the HPT

Continue work to refine the brood rearing habitat layer

Continue work to refine/improve the treed layer within the HPT

Changes to soil layer if needed

Reporting: The Chair of the Technical Subcommittee and/or the Gunnison County GIS Program Manager shall report to the Strategic Committee at its June meeting annually on any updates made to the HPT.

7. 2018 Project Update Team

Matt Vasquez- US Forest Service, *chair*
Russ Japuntich- Bureau of Land Management
Kathy Brodhead- Bureau of Land Management
Theresa Childers- National Park Service
Jim Cochran- Gunnison County
Mike Pelletier- Gunnison County
Nathan Seward- Colorado Parks and Wildlife
Brooke Vasquez- Gunnison Conservation District
Gay Austin- Bureau of Land Management
Tara DeValois- Bureau of Land Management
Liz With- Natural Resources Conservation Service
John Scott- Scott Resources Management
Brooke Vasquez- Gunnison Conservation District
Mark Brennan- USFWS
Pat Magee- Western State Colorado University
Suzie Parker- USFS
Aleshia Fremgen- Interested community member

8. 2011 Project Team

Matt Vasquez- US Forest Service
Russ Japuntich- Bureau of Land Management
Tony Apa- Colorado Parks and Wildlife
Mike Phillips- Colorado Parks and Wildlife
Theresa Childers- National Park Service
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Mike Pelletier- Gunnison County
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Gay Austin- Bureau of Land Management
Tara DeValois- Bureau of Land Management
Liz With- Natural Resources Conservation Service
John Scott- Natural Resources Conservation Service
Amanda- Bureau of Land Management
Ken Stalhnecker- National Park Service
John Toolen- Bureau of Land Management
Charlie Sharp- US Fish and Wildlife Service
Susan Linear- US Fish and Wildlife Service

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RESEARCH ARTICLE

The effects of electric power lines on the breeding ecology of greater sage-grouse

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Abstract

Anthropogenic infrastructure can negatively affect wildlife through direct mortality and/or displacement behaviors. Some tetranoids (grouse spp.) species are particularly vulnerable to tall anthropogenic structures because they evolved in ecosystems void of vertical structures. In western North America, electric power transmission and distribution lines (power lines) occur in sagebrush (*Artemisia* spp.) landscapes within the range of the greater sage-grouse (*Centrocercus urophasianus*; sage-grouse). The U.S. Fish and Wildlife Service recommended using buffer zones near leks to mitigate the potential impacts of power lines on sage-grouse. However, recommended buffer distances are inconsistent across state and federal agencies because data are lacking. To address this, we evaluated the effects of power lines on sage-grouse breeding ecology within Utah, portions of southeastern Idaho, and southwestern Wyoming from 1998–2013. Overall, power lines negatively affected lek trends up to a distance of 2.7 and 2.8 km, respectively. Power lines did not affect lek persistence. Female sage-grouse avoided transmission lines during the nesting and brooding seasons at distances up to 1.1 and 0.8 km, respectively. Nest and brood success were negatively affected by transmission lines up to distances of 2.6 and 1.1 km, respectively. Distribution lines did not appear to affect sage-grouse habitat selection or reproductive fitness. Our analyses demonstrated the value of sagebrush cover in mitigating potential power line impacts. Managers can minimize the effects of new transmission power lines by placing them in existing anthropogenic corridors and/or incorporating buffers at least 2.8 km from active leks. Given the uncertainty we observed in our analyses regarding sage-grouse response to distribution lines coupled with their role in providing electric power service directly to individual consumers, we recommend that buffers for these power lines be considered on a case-by-case basis. Micrositing to avoid important habitats and habitat reclamation may reduce the potential impacts of new power line construction.

OPEN ACCESS

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Editor: Tim A. Mousseau, University of South Carolina, UNITED STATES

Received: February 23, 2018

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Data Availability Statement: Data are available through Utah State University (USU) who meet the criteria for access to confidential data. Data held by USU are restricted for ethical and legal reasons as many of the locations were collected by permission of private landowners who allowed researchers access to private lands for the purpose of the research, on condition exact locations would not be disclosed. The power line and lek data were provided under a confidentiality agreement by the Utah Division of Wildlife Resources (UDWR) and Rocky Mountain Power (RMP). Given the

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10028] - Webmaster Receipt
Date: Friday, September 20, 2019 4:34:41 PM

Thank you for your input, Kurt Broderdorp.

The tracking number that has been assigned to your input is **10028**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 20, 2019 16:34:27 CDT

First Name: Kurt
Last Name: Broderdorp
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: US Fish and Wildlife Service

Input

The US Fish and Wildlife Service provides the following recommendations and comments.

Within greater sage-grouse (GRSG) habitat, we recommend relocating the energy corridor rights-of-way outside of priority habitat management areas (PHMA) and general habitat management areas (GHMA). If a relocation of the corridors cannot be accomplished, we recommend narrowing the width of the corridors to 1000 feet within GRSG PHMA and GHMA.

Within Gunnison sage-grouse habitat, The Service supports your proposed partial corridor deletion of milepost markers 0-10 on the 130-274 Corridor, the deletion of Corridor 130-274 (E), and the potential revision to Corridor 130-274 (E). We believe these changes help reduce further fragmentation of Critical Habitat for Gunnison sage-grouse and help preserve the habitat quality near the Miramonte Reservoir in San Miguel County. The Service commends your commitment to conserving species listed under the Endangered Species Act and working cooperatively with local agencies.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10029] - Webmaster Receipt
Date: Friday, September 20, 2019 4:57:10 PM
Attachments: [ID_10029_WashingtonCountyWaterConservancyDistrictCommentonSection368EnergyCorridorReview.pdf](#)

Thank you for your input, Morgan Drake.

The tracking number that has been assigned to your input is **10029**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 20, 2019 16:56:48 CDT

First Name: Morgan

Last Name: Drake

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Washington County Water Conservancy District

Input

[Blank]

Attachments

Washington County Water Conservancy District Comment on Section 368 Energy Corridor Review.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



September 20, 2019

Sent via web form

U.S. Bureau of Land Management (BLM)
U.S. Forest Service (USFS)
U.S. Department of Energy (DOE)

Washington County Water Conservancy District Comment on Section 368 Energy Corridor Review: Regions 2 and 3

Thank you for the opportunity to comment on the Section 368 Energy Corridor Review for Regions 2 and 3 (hereinafter "Review") prepared by the Bureau of Land Management (BLM), the United States Forest Service (USFS), and the United States Department of Energy (DOE) (hereinafter "Agencies").

The Energy Policy Act of 2005 directed multiple federal agencies to designate "corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land in the eleven continuous Western States." 42 U.S. § 15926(a)(1). The agencies are directed to expedite applications for energy construction, while considering prior environmental analyses and reviews. *Id.* § 15926(c)(2). The intent of Congress in directing agencies to designate energy corridors is to satisfy the need for "upgraded and new electricity transmission and distribution facilities to improve reliability, relieve congestion, and enhance the capability of the national grid to deliver electricity." *Id.* § 15926(d).

1. Visual Resource Management (VRM) Classification

Section 368 energy corridors are managed as VRM Class III or VRM Class IV. Review, page 31. The BLM visual resources handbook (Section V.B.4) states the following as the objective for Class IV:

The objective of this class is to provide for management activities which require major modifications of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements.

September 20, 2019

Page 2

Under VRM IV, BLM still has authority to minimize visual impacts, though it is acknowledged that the level of change to the landscape can be high. Given the ongoing discretion of BLM to minimize visual impacts, it simply is not necessary to overlay VRM III on a designated energy corridor. Doing so creates a significant bias for visual resources over needed energy infrastructure.

Many designated energy corridors overlap areas managed as VRM Class II or III. This can limit future development within energy corridors due to the lower level of change allowed to the characteristic landscape. Instead, all VRM areas within designated energy corridors should be managed as VRM Class IV. The Agencies should not meet siting principles by minimizing or mitigating impacts on a case-by-case basis. This case-by-case management could allow agencies to add onerous, timely, and costly environmental protection requirements to needed energy projects within the corridor. Such requirements would not satisfy the intent of Congress.

2. Area of Critical Environmental Concern (ACEC)

Where Section 368 energy corridors intersect with areas designated as avoidance, the agencies should balance the need for energy corridor development with the objective of minimizing environmental impacts. Review, page 32. ACEC's can result in the creation of exclusion or avoidance areas within ROWs and other land use authorizations, thereby impairing their original intended use or adding costly mitigation measures in an effort to reduce impacts to affected resources. Such constraints interfere with the intent of Congress to expedite energy related construction and to satisfy the need for electricity facilities. To follow the intent of Congress, all ACEC boundaries should be revised to avoid conflict with designated energy corridors. Further, the Agencies should not meet siting principles through minimizing or mitigating impacts on a case-by-case basis. As explained above, case-by-case management could promote the placement of costly and unnecessary restrictions on energy development within the corridor.

3. Recommended Interagency Operating Procedures (IOPs) Revisions

a. Old Spanish Nation Historic Trail (NHT)

The Old Spanish NHT intersects with multiple Section 368 energy corridors. The Review proposes adding an IOP for NHTs as well as for visual resources to help further minimize impacts where energy corridors overlap with the Old Spanish NHT. Review, Volume 2, page 93, 105. The Agencies should avoid creating an IOP that would add costly and onerous restrictions on energy development within the corridor. This would go against the intent of Congress in mandating that agencies designate energy corridors. It is inappropriate to allow visual resource restrictions created by a historic trail to limit use of designated energy corridors.

b. Wildlife Migration Corridors and Wildlife Habitat

Wildlife migration corridors and wildlife habitat have been identified within multiple Section 368 energy corridors. The Review proposes adding an IOP to help minimize impacts on wildlife migration corridors and habitats. Review, Volume 2, page 44, 93. This new IOP should not place

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Page 3

costly or onerous restrictions on energy development within the corridor. The Agencies must avoid inhibiting Congress's intent to expedite applications for new energy construction.

4. Recommended Corridor Revisions

a. 68-116 (Page Corridor)

Corridor 68-116 is designated a multi-modal corridor for electric transmission and pipelines. Review, Volume 2, page 43. The following management decision should be made to preserve the designated energy corridor:

- VRM Class II and III areas within the corridor should be revised to Class IV. At the very least, VRM Class II areas within the corridor should be revised to Class III. Review, Volume 2, page 44.

b. 113-116 (Mesquite to Fredonia Corridor)

Corridor 113-116 is designated a multi-modal corridor for electric transmission and pipelines. Review, Volume 2, page 89. The following management decisions should be made:

- The Beaver Dam Slope ACEC boundary should be revised to avoid intersecting with the corridor. Review, Volume 2, page 90.
- The Kanab Creek ACEC boundary should be revised to avoid conflict with the corridor. Review, Volume 2, page 90.
- ROW avoidance areas should not be established within the corridor for purposes of protecting critical habitat for federally listed species, such as Southwestern Willow Flycatcher, Virgin River Chub, and Woundfin. Review, Volume 2, page 90-91. Instead, mitigation measures, such as scheduling construction times to avoid breeding seasons, should be used to avoid adverse effects on special status species habitat while continuing to honor Congress in creating the corridor. Review, Volume 2, page D-6.
- The Lower Virgin River ACEC boundary should be revised to avoid conflict with the corridor. Review, Volume 2, page 91.
- The Mormon Mesa ACEC boundary should be revised to not intersect with the energy corridor. Review, Volume 2, page 91.

c. 116-206 (Kanab - Salina - Santaquin Corridor)

Corridor 116-206 is designated a multi-modal corridor for electric transmission and pipelines. Review, Volume 2, page 103. The following management decisions should be made:

- The Johnson Spring ACEC boundary should be revised to avoid intersecting with the energy corridor. Review, Volume 2, page 103.

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Page 4

- VRM Class II and III areas within the corridor should be revised to VRM Class IV. At the very least, VRM Class II areas within the corridor should be revised to Class III. Review, Volume 2, page 103.

Best regards,

A handwritten signature in blue ink, appearing to read "Morgan Drake", with a stylized, cursive script.

Morgan Drake
Staff Attorney

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10030] - Webmaster Receipt
Date: Sunday, September 22, 2019 9:39:27 AM
Attachments: [ID 10030 WWECLetter.docx](#)

Thank you for your input, Amy Eaton.

The tracking number that has been assigned to your input is **10030**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 22, 2019 09:39:15 CDT

First Name: Amy

Last Name: Eaton

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Sustainable Development Strategies Group

Input

[Blank]

Attachments

WWEC Letter.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

Dear Georeann Smale, Reggie Woodruff, and Brian Mills:

I am President of Sustainable Development Strategies Group, a nonprofit tax exempt research organization that is focused on improving the management of natural resources worldwide. Our organizational headquarters is in Gunnison County, Colorado.

We are writing this letter on our own behalf and on behalf of the many other citizens here who care deeply about the quality of our outstanding natural environment, our cultural heritage, and the condition of our communities.

Our comments are with regards to Corridor 87-277, and in particular, the “Western Portion of Corridor 87-277.” Our comments are organized into three sections. The first section deals with some specific issues along the proposed Energy Corridor route through Gunnison County, Colorado. The second deals with more general concerns about any future development of energy transportation infrastructure in the Corridor. Finally, we share some concerns about what we see as the inadequacy of the process by which this consideration is occurring.

1. SPECIFIC CONCERNS RELATED TO THE ENERGY CORRIDOR ROUTE IN GUNNISON COUNTY, COLORADO

- A majority of the corridor that spans the length of Gunnison County has been identified as a "Section 368 Corridor of Concern" (as defined in the plaintiff lawsuit) due to the counties' ecological and environmental qualities. As such, the stretch of corridor through Gunnison County, if constructed, should require extensive mitigation efforts, completion of an EIS, and or alternative corridor consideration.
- The WWEC runs directly through land that is designated as Critical Habitat for the Gunnison Sage Grouse by the Endangered Species Act (ESA), especially along MP 84.3 -127.3. There is already existing energy infrastructure that has been identified as having an adverse impact on the Gunnison Sage Grouse and development of the WWEC through this area further jeopardizes the vitality of an already at-risk species. *We also believe that conformance with the Gunnison Basin Gunnison sage-grouse Conservation Agreement on Federal Lands is a mandatory part of all corridor practices in the Gunnison Basin.*
- Gunnison County contains an abundance of important cultural/historical sites. There is a direct corridor overlap with The Historic Aberdeen Quarry site near MP 108. Originally discovered in 1888, this quarry was found to have exceptionally high-quality granite; a small town soon blossomed near the quarry (Aberdeen, CO). Aberdeen had a schoolhouse, Post Office, and a spur of the Denver & Rio Grande Railroad which was used to transport this exceptional granite to Denver where it was used for the construction of the State Capitol building. As the proposed route runs directly through the Aberdeen Quarry, considerations should be made for the possibility of encountering historic artifacts in this area (e.g., equipment, remains).
- The WWEC passes through BLM Wilderness Study Areas. As adopted from The Wilderness Society, "Because all wilderness-quality lands are inappropriate for infrastructure development, the Agencies should use a consistent approach to addressing intersections with wilderness-quality lands that commits to avoiding intersections, identifies a path to making needed revisions to

corridors and requires the use of mitigation measures where unavoidable impact occurs." Two BLM Wilderness Study areas intersect the corridor:

- Stubbs Gulch MP 103-108, approximately 835 acres of overlap
- Sugar Creek MP 113-114, approximately 260 acres of overlap
- *The Corridor crosses the North Branch of the Old Spanish Trail, (a National designated historic trail), at least two times on private property in Gunnison County*
- The WVEC is in close proximity to the Waunita Hot Springs. Comparing the provided interactive mapping tool to Google Earth, the WVEC appears to run through the Waunita Hot Springs area; a zone which is defined as having *moderate to high scenic integrity objectives*. As Waunita is both a tourist attraction and a known geothermal energy resource area, concerns about it should not be ignored.
- *The “Corridor Rationale” states that “(a)ny new pipelines would likely follow along U.S. Highway 50; there is one existing gas pipeline that roughly follows U.S. Highway 50 east of Gunnison.” Adoption of this rationale ought not to be assumed to be an accomplished fact without considerable evaluation of the impacts to private properties, lands subject to conservation easements, water bodies, agricultural and cultural lands adjacent to Highway 50, the Gunnison County landfill, a federal Uranium Mill Tailings Radiation Control Act disposal and long-term stabilization site, and the lands - nearby the intersection of Highway 50 and Highway 114—of the Coldharbor Institute, a community supported nonprofit that facilitates education, incubation and demonstration of responsible personal, community and land practices*

2. GENERAL CONCERNS THAT MUST BE ADDRESSED BEFORE DEVELOPMENT OF ANY INFRASTRUCTURE IN THE CORRIDOR

- We understand that this is a general, programmatic review. However, site-specific concerns cannot be resolved or avoided by the large-scale, corridor level planning currently underway. Because there is no actual policy/mandate for the construction of the corridor, we assume there will be an additional thorough potential impact review and opportunity for stakeholder involvement prior to actual construction. If construction were to proceed, some points to consider may include:
 - Local community impacts: economic boom/bust, employee housing, traffic
 - Construction impacts such as sediment transfer and erosion
 - Impacts of land clearing on drainages and wetlands
 - *For example, “The Western Portion of Corridor 87-277 crosses significant water bodies including Tomichi Creek and Cochetopa Creek. Particular attention is required to avoid immediate, on-site consequences to these water bodies and their tributaries, as well as downstream impacts to the waters in the Curecanti National Recreation Area and Black Canyon of the Gunnison River.*

- Disruption to wildlife corridors, such as the big game winter range in east Gunnison County
- Reclamation requirements

3. CONCERNS REGARDING THE CONSULTATIVE PROCESS

- The goal of the review process is to ensure that the corridor location best satisfies the requirements of the siting principles. The current review process has not been 'publicized' to the extent necessary to elicit an appropriate level of meaningful and substantial stakeholder involvement for thorough evaluation of the corridor siting. The development of the WWEC is a major project with the potential for significant, landscape-scale impacts and the fact that the review process has not been well publicized is concerning.

Thank you for taking our comments into account.

Sincerely,

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10031] - Webmaster Receipt
Date: Sunday, September 22, 2019 5:07:39 PM
Attachments: [ID 10031 Regions 23 Report ASNFScomments.pdf](#)

Thank you for your input, Esther Morgan.

The tracking number that has been assigned to your input is **10031**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 22, 2019 17:07:02 CDT

First Name: Esther
Last Name: Morgan
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Apache-Sitgreaves National Forests

Input

Thank you for providing us another opportunity to provide input. As I am only able to upload 10 MB at a time, apparently, I will have to attach one document at a time.

I could not access the corridor summaries for Regions 2-3, despite trying several computers and browsers over the course of the month. The 40+ MB document may be the issue. I would have liked to have had the opportunity to read through the information for Corridor 62-211, which is partly located on the Apache-Sitgreaves National Forests.

The first attachment is the report. Thank you.

Attachments

[Regions_2-3_Report_ASNFScomments.pdf](#)

Questions? Contact us at: corridoreiswebmaster@anl.gov

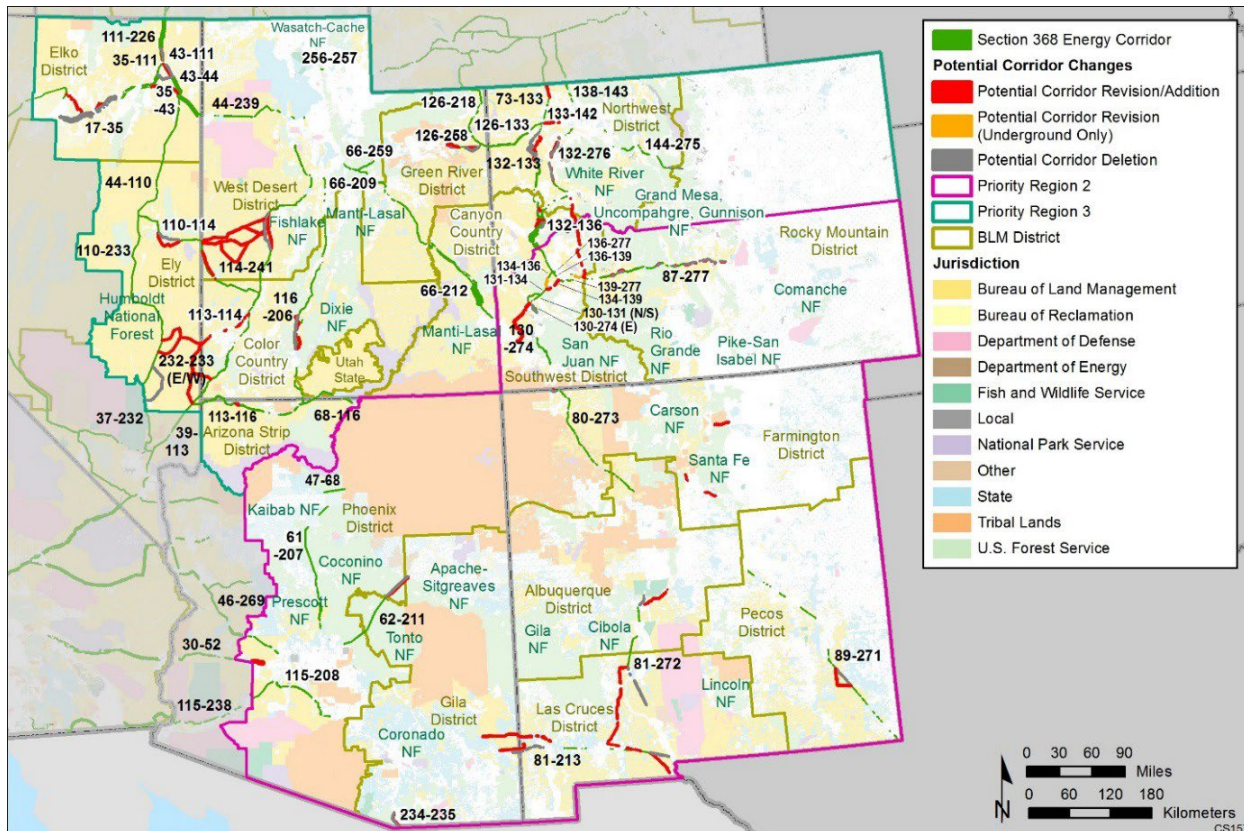
August 2019

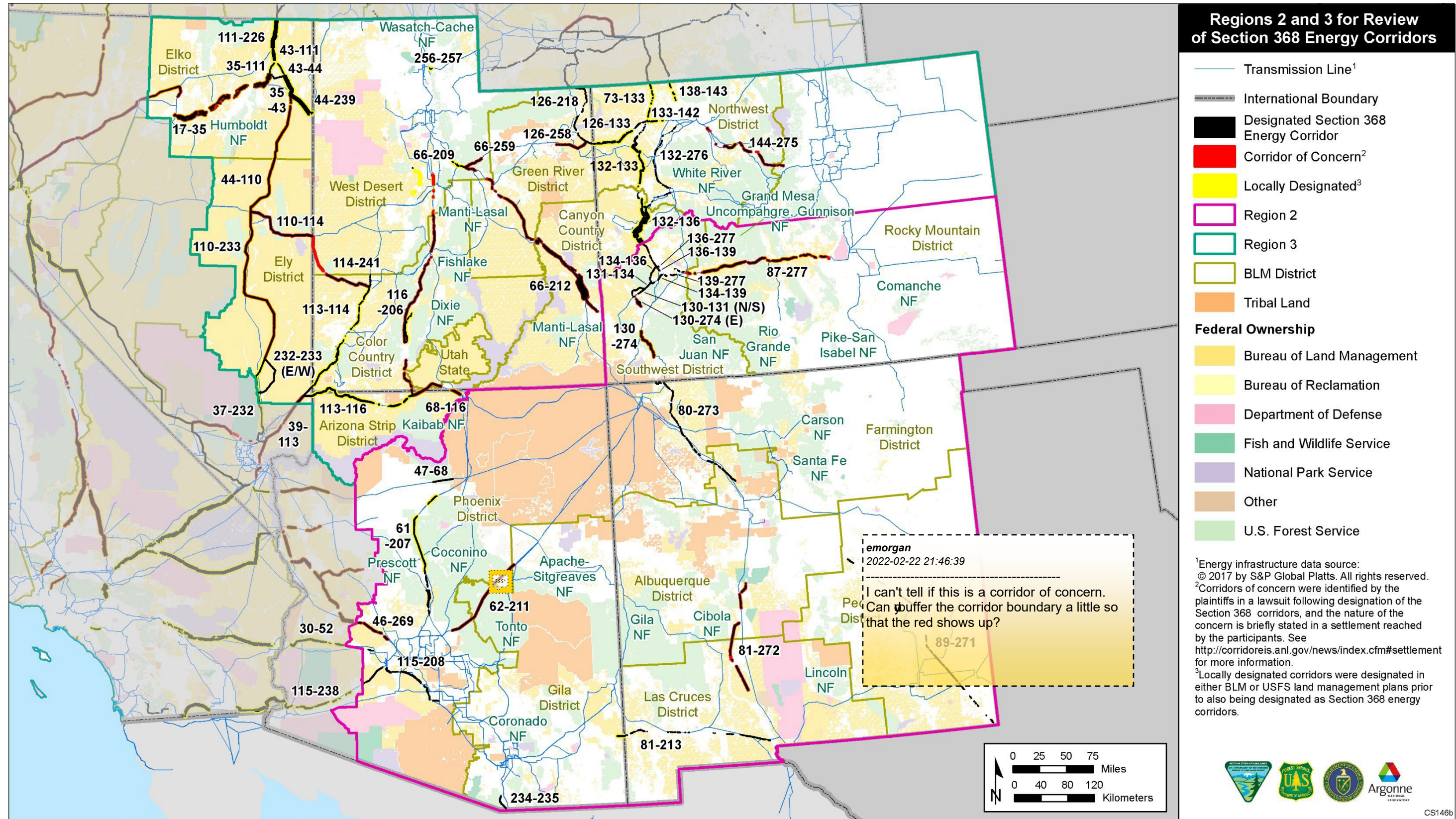


Energy Policy Act of 2005

Section 368 Energy Corridor Review

REGIONS 2 and 3





¹Energy infrastructure data source: © 2017 by S&P Global Platts. All rights reserved.
²Corridors of concern were identified by the plaintiffs in a lawsuit following designation of the Section 368 corridors, and the nature of the concern is briefly stated in a settlement reached by the participants. See <http://corridoreis.anl.gov/news/index.cfm#settlement> for more information.
³Locally designated corridors were designated in either BLM or USFS land management plans prior to also being designated as Section 368 energy corridors.



CS146b

Figure 1-1 Section 368 Energy Corridors in Regions 2 and 3

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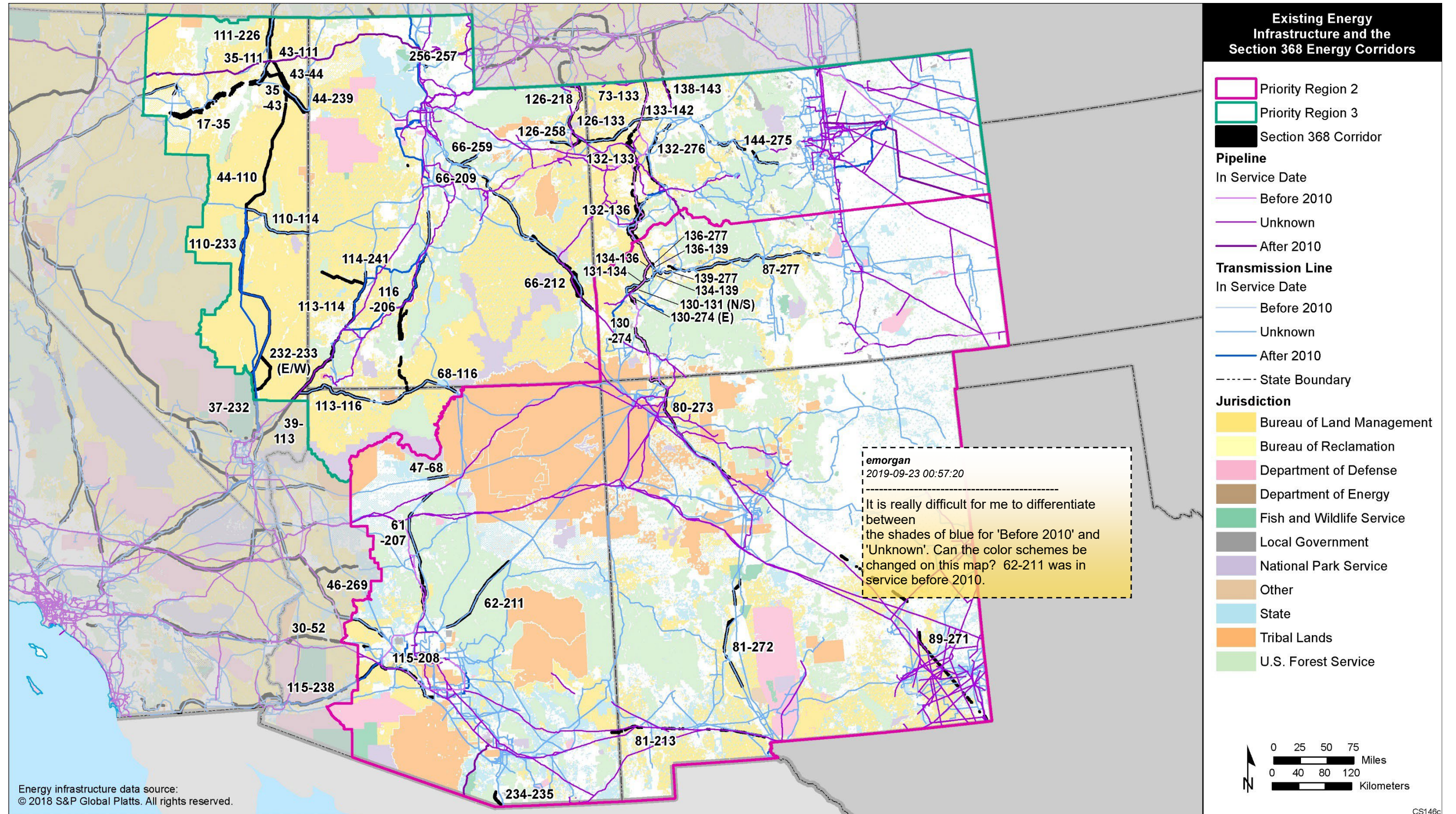


Figure 2-1 Existing Energy Infrastructure and the Regions 2 and 3 Section 368 Energy Corridors

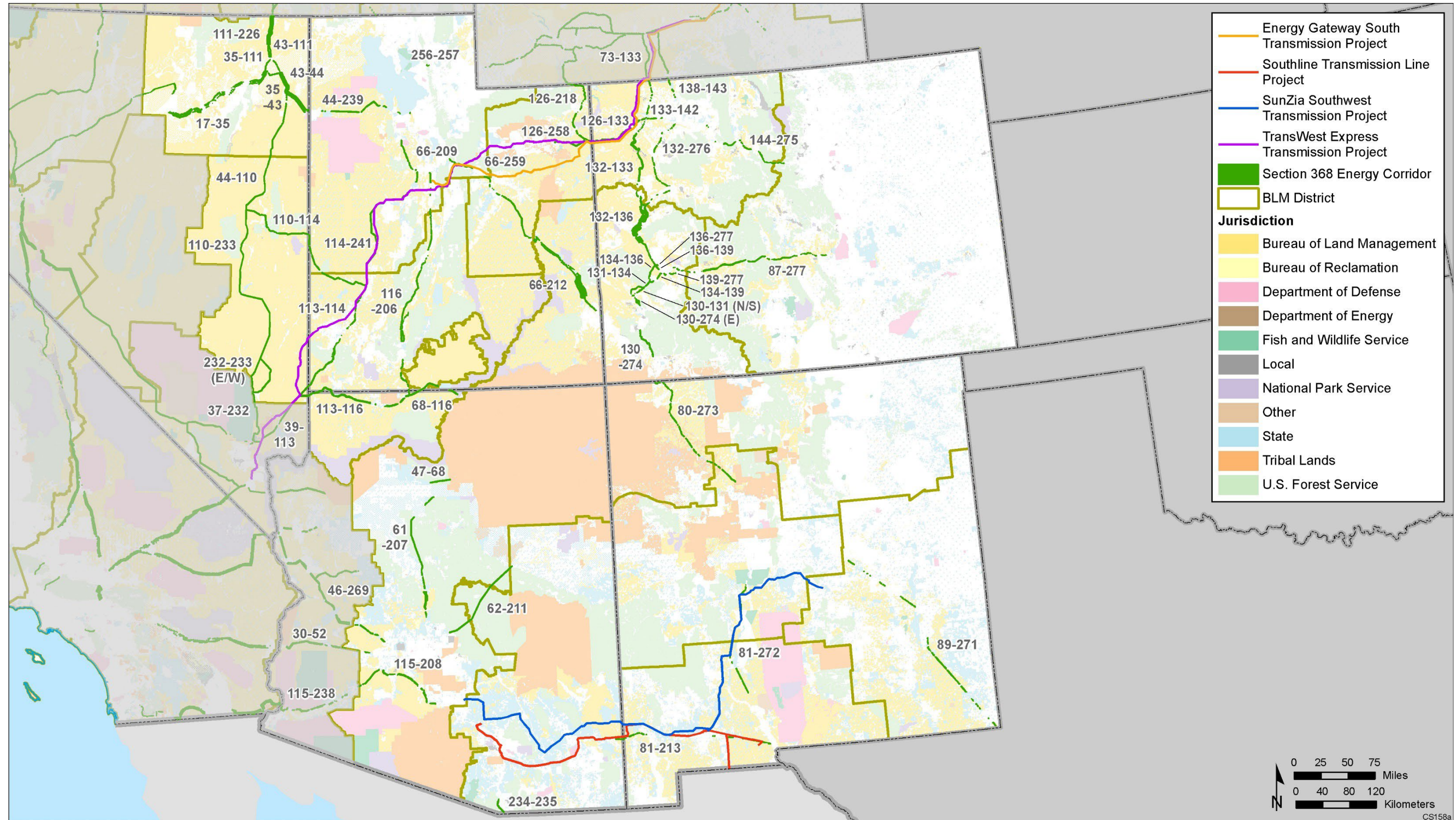



Figure 2-2 Recently Authorized Interstate Electric Transmission Projects in Regions 2 and 3

- Consider a corridor shift when a Section 368 energy corridor straddles a road or trail (e.g., an Interstate Highway, National Scenic or Historic Trails (NSHTs), or a Scenic Byway) to increase the potential for meeting applicable VRM objectives.
- Encourage proponents of projects in Section 368 energy corridors to integrate visual resource planning and design principles during the early phases of project planning to meet BLM VRM and USFS scenic integrity objectives and avoid land use plan amendments.

During the Regions 2 and 3 Review, the Agencies identified two additional actions that would help regional and local agency planning offices address concerns related to Section 368 energy corridors:

- Consider realigning corridors with existing infrastructure to allow maximum utilization. Figure 3-2 is an example of how a corridor can be shifted along existing infrastructure to allow maximum utilization as well as avoid an ACEC and lands with wilderness characteristics.
- Include robust communication between local BLM and USFS offices and the Section 368 Interagency Workgroup in Agency policy and/or program guidance to ensure that changes to Section 368 energy corridors resulting from land use revisions or amendments are updated in the Section 368 energy corridor mapping tool to provide transparency to stakeholders. 

emorgan
2019-09-23 00:58:27

How long will this website be available to ~~State~~ and the public? Who will be responsible for updating the website as changes are made?

Corridor # ^a and Location	Potential Revision, Deletion, or Addition	Rationale
<p>62-211 Arizona</p>	<p>Revision: Consider shifting the corridor between MP 60 and MP 87, less than 1 mile east and south along the existing 345-kV transmission line, so that the existing transmission line becomes the northern boundary of the corridor.</p>	<p>The potential corridor revision would allow maximum utilization and avoid potential impacts on the General George Crook National Recreation Trail, the Mogollon Rim, Chevelon Creek River (which is eligible for Wild and Scenic River status), Chevelon Crossing, aquatic endangered species, the Citizen's proposed wilderness, USFS Roadless Areas and USFS potential wilderness areas, scenic integrity, cultural resource site density, Steep Ridge, and the Vincent Ranch property.</p>
<p>73-133 Colorado</p>	<p>Revision: Consider shifting the corridor to the east between MP 46 and MP 57 and MP 72 and MP 79, so that the existing pipelines and the management plan calls for the corridor to be placed over the centerline of the existing corridor. According to Jeremy, ultimately it is the land manager that decides its placement. As such, perhaps this should be the word to state that the corridor will</p>	<p>The potential corridor revision would avoid lands with wilderness characteristics, the spring creek drainage, and cultural sites. The potential corridor revision would minimize impacts through collocation with existing and planned infrastructure and would maximize utility by increasing capacity within the corridor.</p>
<p>80-273 New Mexico</p>	<p>Revision: Consider shifting the corridor at MP 131 to follow existing infrastructure.</p>	<p>The potential corridor revision would maximize utility and minimize impacts by collocating along existing infrastructure and avoiding the Morris 41 ACEC.</p>
<p>81-213 New Mexico Arizona</p>	<p>Revision: Consider realigning the corridor between MP 0 and MP 18 along an existing 345-kV transmission line south of the corridor to avoid overlapping the Afton SEZ.</p> <p>Consider realigning the corridor along the authorized route for the Southline Transmission Project between MP 28 and MP 78. Consider adding a corridor segment (braid) to the north along the SunZia and Southline authorized routes. The northern corridor segment (braid) could be designated for electric transmission lines, and the southern corridor segment (braid) could be designated for pipelines.</p> <p>Consider realigning the corridor at MP 100 with the authorized SunZia Southwest Transmission Project and Southline Transmission Project.</p>	<p>The potential corridor revision would maximize utility by expanding capacity within the corridor and allowing full build-out of the Afton SEZ to provide transmission access to the SEZ.</p> <p>The potential corridor revision would improve corridor utility and minimize impacts by realigning the corridor along the SunZia and Southline authorized routes. The potential corridor revision would improve utility because there are numerous homes and farms along the current route that could prevent future development. The additional corridor segment could accommodate different needs of electric transmission lines and oil and gas pipelines in river crossing areas.</p> <p>A potential re-routing of the corridor at MP 100 would avoid Lordsburg Playa, Organ Mountain Desert Peaks, a Visual Resource Management (VRM) Class II area, and Butterfield Trail.</p>
<p>81-272 New Mexico</p>	<p>Revision: Consider realigning the corridor between MP 0 and MP 40 with the authorized route for the SunZia Southwest Transmission Project.</p>	<p>The potential corridor revision would maximize utility and minimize impacts by collocating along existing infrastructure. From MP 0 to MP 25, the potential corridor revision would avoid impacts on El Camino Real de Tierra Adentro NHT, minimize impacts on wildlife, and avoid crossing the Rio Grande River.</p>

Corridor # ^a and Location	Potential Revision, Deletion, or Addition	Rationale
No Potential Revisions, Deletions, or Additions		
35-111	61-207	126-218
37-232	66-209	130-131
39-113	66-212	131-134
43-44	66-259	132-136
44-110	68-116	136-139
44-239	110-233 (see <i>TransWest Express Connector Corridor Addition Summary</i>)	136-277
46-269	111-226	138-143
47-68	115-238	<i>emorgan</i> 139-277
	126-133	2019-09-23 01:02:09

^a Corridors of Concern are identified in red text.

I want to make sure I'm reading this part of the table correctly in that these corridors have no potential revisions, deletions or

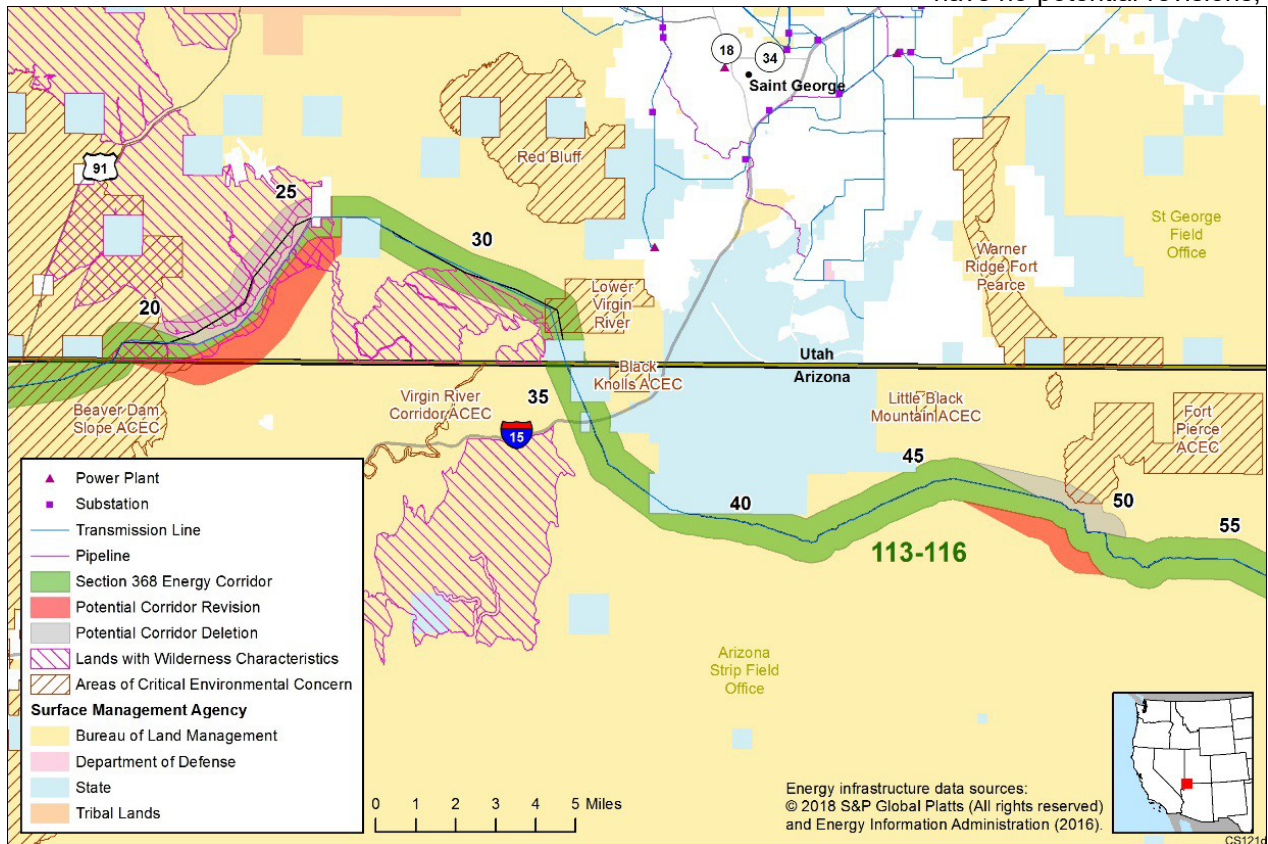


Figure 3-2 Corridor 113-116: Example Corridor Shift to Avoid ACEC

emorgan
2019-09-23 01:02:09

Having an example is great; would it be possible to refer to the corridor summaries document, and could you break that document down by corridor or something so that we can download it or at least open it on a web browser without crashing our computers?

3.3 Corridor Management

The minimum specifications for each designated energy corridor include specifying the length, width, and compatible uses of the corridor. The regional reviews have identified that this minimum standard lacks the detail needed to administer Section 368 energy corridors effectively in terms of corridor utilization and resource protection. Agency land use planning needs improved Section 368 energy corridor management specifications and direction to enhance corridor utilization and resource protection both inside and outside Section 368 energy corridors. Agency land use plans should:

- Include a legal description for the corridor centerline.
- Specify the corridor width and, if the corridor width varies, how the width variations occur.
- Specify modes of corridor use (e.g., multimodal, electric transmission only, pipeline only, underground use only).
- Enumerate compatible corridor uses in the following order of priority: major energy transmission infrastructure, minor energy transmission infrastructure, broadband telecommunications and fiber-optic infrastructure,³⁶ and access roads).
- Identify non-compatible corridor uses.
- Enumerate corridor management objectives.
- List management actions to improve transmission reliability, relieve congestion, and enhance the capability of the energy grid to deliver electricity.
- Preclude or limit certain types of land use allocations as necessary to insure the orderly administration of Section 368 energy corridors as preferred locations for long-distance oil, gas, and hydrogen pipelines and high-voltage electric transmission and distribution lines.
- Align other management actions with the purposes of Section 368 energy corridors. Examples of this type of alignment include the following:

- Section 368 energy corridors serve a public benefit by providing a reliable location for energy transmission infrastructure development for the supply of energy essential to the local, regional, and national economies.
- Vegetative conditions and vegetation management objectives are aligned with energy transmission reliability standards.
- Other land uses in Section 368 energy corridors are compatible with and not detrimental to construction, operation, maintenance, and decommissioning of energy transmission facilities and associated access and infrastructure.
- Obsolete or unused facilities in Section 368 energy corridors are promptly removed, and the areas where the removed facilities were situated are rehabilitated to the satisfaction of the authorized officer.
- Section 368 energy corridors are managed as recreational avoidance areas (for both motorized and non-motorized uses).
- Section 368 energy corridors are managed to meet the information management objectives.
- Section 368 energy corridors are managed to avoid the spread of noxious and invasive plant species in the corridors.

emorgan
2019-09-22 14:26:09
Yes, thank you for pointing this out.
...and how
...electric transmission only, pipeline only,
...following order of priority: major energy
...transmission and distribution infrastructure,

emorgan
2019-09-23 01:03:20
Please include how land managers would
manage existing National Historic Trails,
National Recreation Trails and National
Forest System roads that are located
under/over existing energy corridors or will
be under/over new energy corridors.

Additional guidance on land use planning for Section 368 energy corridors is contained in Appendix F.

Designated ROW corridors are preferred locations for linear ROWs and facilities. Where there are competing management objectives for the same Federal lands (e.g., a corridor intersects with an area designated as “avoidance” in the land use plan), the agency planning staff should balance the need for responsible corridor development with the objective of minimizing adverse environmental impacts. The corridor summaries identify conflicting management objectives in each of the Regions 2 and 3 Section 368 energy corridors and potential corridor additions that could address those conflicts.

3.4 General Considerations for IOP Revisions, Deletions, and Additions

IOPs are critical for expediting application processing in Section 368 energy corridors and providing consistency between the BLM and USFS in administering Section 368 corridors. The IOPs were developed through the West-wide Energy Corridor PEIS and designated the subsequent BLM and USFS RODs to provide uniform criteria for evaluating proposals and applications for using Section 368 energy corridors. The IOPs are similar to BMPs, but they are mandatory and apply to all proposals, applications, and authorizations for energy transmission projects in Section 368 energy corridors administered by the BLM and USFS. The IOPs are presented in Appendix B of both RODs.

The Agencies have determined that the IOPs are sometimes poorly understood and inconsistently utilized. Therefore, in addition to identifying potential revisions, deletions, and additions to the IOPs in the regional reviews, the Agencies are evaluating how to enhance understanding and consistent application of the IOPs.

The Region 1 Report identified the need for three new IOPs related to habitat connectivity, an ecological resource, lands with wilderness character ([Region 1 Report](#)). In addition, the Region 1 Report related to: visual resources, vegetation management, and existing IOPs could be revised through inter-

emorgan
2019-09-23 01:04:16


need to revise three existing IOPs
Habitat connectivity, National Historic Trails, visual resources, and vegetation management, would be applicable for the ASNFs, too. Also, wild and scenic rivers, wildlife quiet areas, and geomorphic processes (i.e., erosion control).

NH

3.4.1 Potential IOP Additions

During the Regions 2 and 3 review, the Agencies identified the following potential new IOPs for wildlife migration corridors and tribal concerns and ethnographic studies:

Ecological Resources. In addition to the IOP on habitat connectivity, the Agencies should consider adding an IOP related to wildlife migration corridors and habitat. This would help ensure that appropriate consideration of wildlife migration corridors and habitat occurs in connection with evaluation of proposed development in Section 368 energy corridors. Secretarial Order 3362, “Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors” should be adhered to and further coordination with the Western Governors Association should be performed when developing the potential new IOP.

Tribal Concerns and Ethnographic Studies  In addition to an existing IOP on tribal engagement, the Agencies could revise or add an IOP which emphasizes the importance of working with tribes to conduct ethnographic studies to increase the Agencies' understanding of significant resources of concern to tribes. This would help facilitate better understanding of those resources in connection with evaluation of proposed development in Section 368 energy corridors.

emorgan

2019-09-23 01:06:00

Mitigation of effects to cultural resources -
~~via~~
through design/avoidance and a management plan development for resources within the corridor, or through data recovery, should be an IOP, too. ASNF and TNF both have high site densities. I expect the Coconino, Kaibab and Prescott would as well.

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10032] - Webmaster Receipt
Date: Sunday, September 22, 2019 5:08:50 PM
Attachments: [ID 10032 Regions 23 Appendices ASNFsComments.pdf](#)

Thank you for your input, Esther Morgan.

The tracking number that has been assigned to your input is **10032**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 22, 2019 17:08:41 CDT

First Name: Esther
Last Name: Morgan
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Apache-Sitgreaves NFs

Input

Attached are my comments for the Regions 2-3 Appendices. Thank you.

Attachments

[Regions_2-3_Appendices_ASNFsComments.pdf](#)

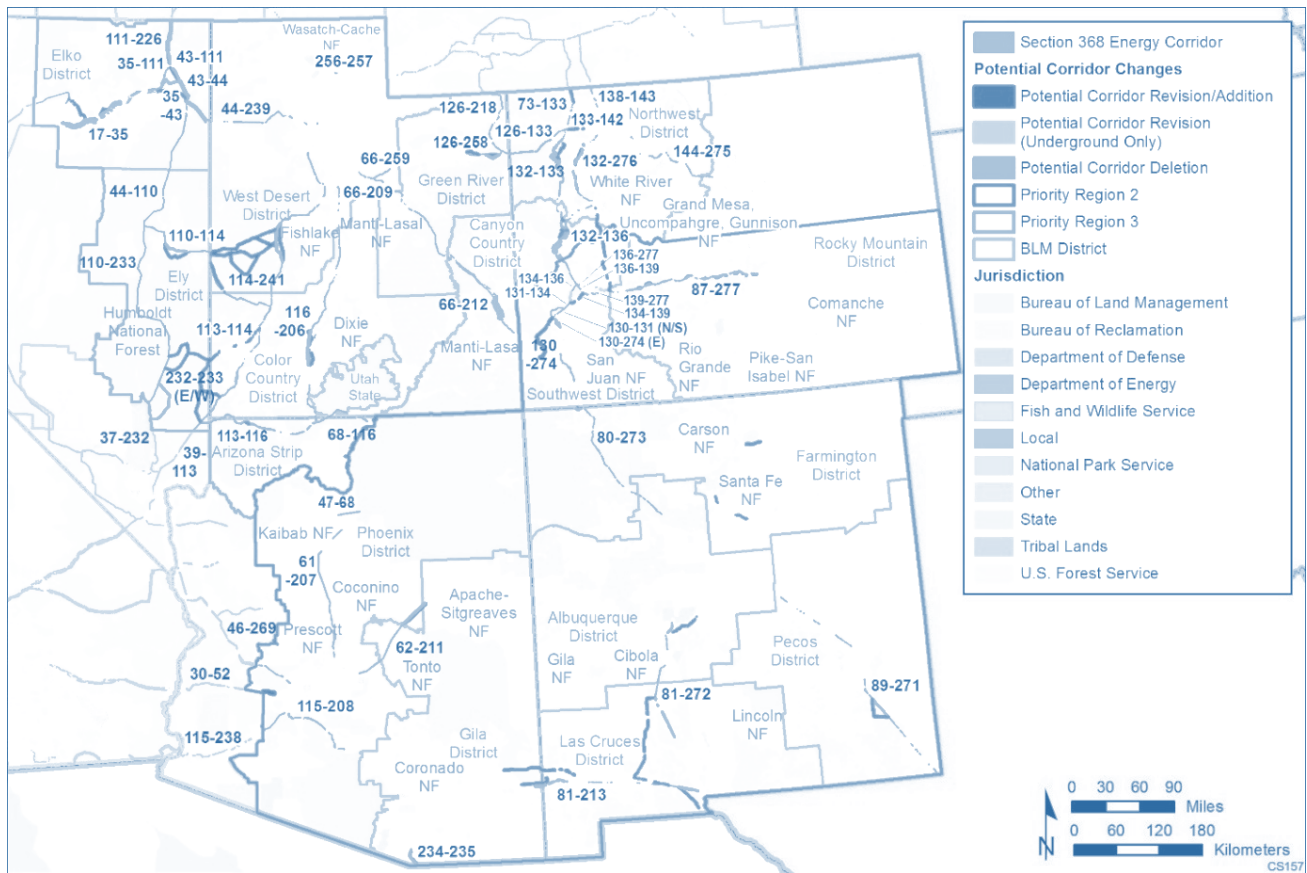
Questions? Contact us at: corridoreiswebmaster@anl.gov



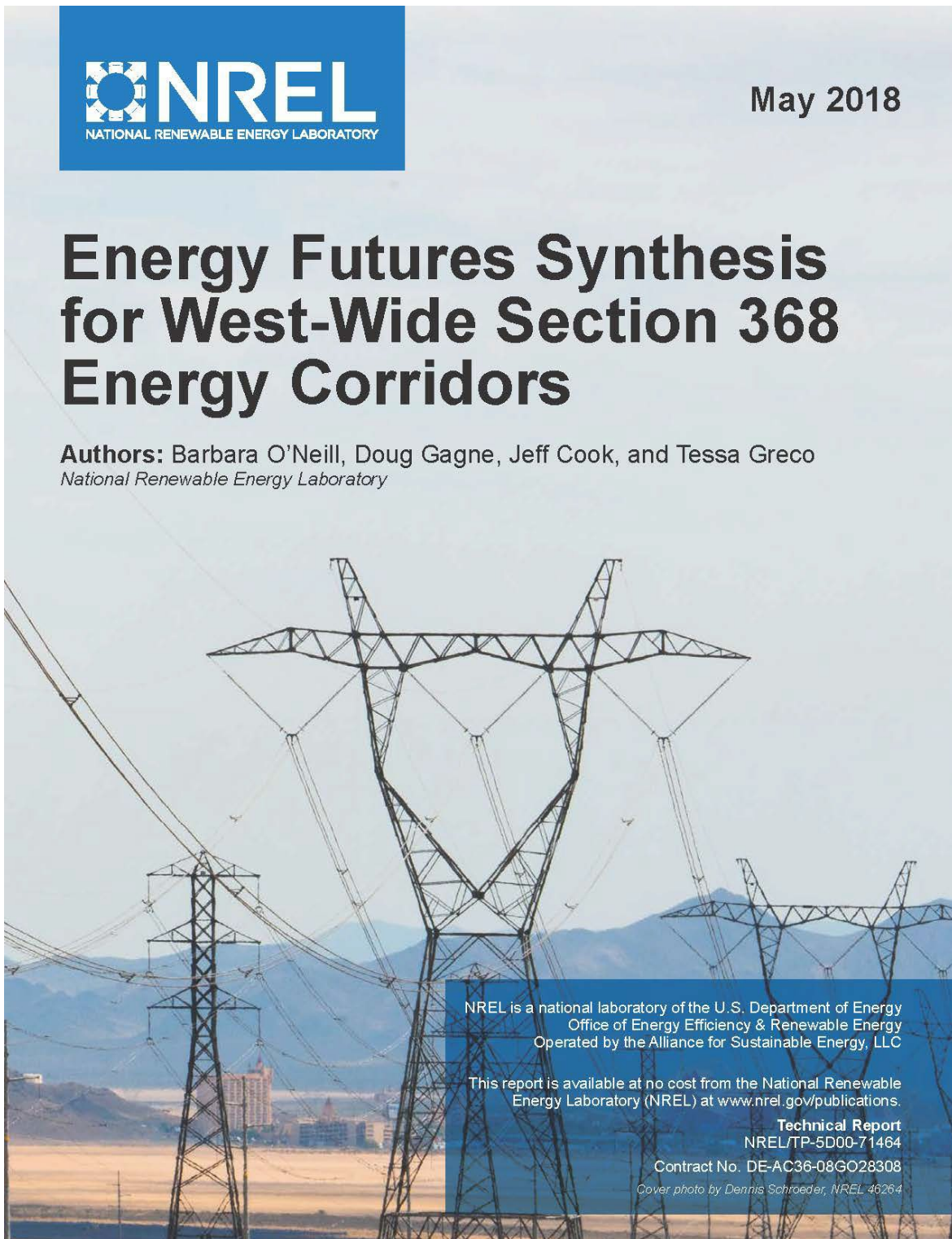
Section 368 Energy Corridor Review

VOLUME 2 — REGIONS 2 AND 3

APPENDICES: SUPPORTING INFORMATION



Appendix B: Energy Futures Synthesis for West-Wide Section 368 Energy Corridors



The [Energy Futures Synthesis Report](#) is available on the West-wide Energy Corridors website.


Appendix C: Land Use Plans Associated with Regions 2 and 3 Section 368 Energy Corridors

Table C-1 Land Use Plans Associated with Regions 2 and 3 Section 368 Energy Corridors

Corridor		
30-52	Arizona	Bradshaw-Harquahala RMP ¹ Lower Sonoran RMP ²
46-269	Arizona	Bradshaw-Harquahala RMP
47-68	Arizona	Kaibab National Forest LMP ³
61-207	Arizona	Bradshaw-Harquahala RMP Kaibab National Forest LMP Prescott National Forest LMP ⁴
62-211	Arizona	Apache-Sitgreaves National Forests LMP ⁵ Tonto National Forest Plan ⁶
80-273	New Mexico	Farmington RMP ⁷ Rio Puerco RMP (1986b) and Rio
81-213	Arizona New Mexico	Safford District RMP ⁹ Mimbres RMP ¹⁰
81-272	New Mexico	Socorro RMP ¹¹ White Sands RMP ¹²
87-277	Colorado	Gunnison Resource Area RMP ¹³ Royal Gorge RMP ¹⁴ Grand Mesa, Uncompahgre, and LMP ¹⁵ Pike and San Isabel National Forests
89-271	New Mexico	Carlsbad RMP ¹⁷ Roswell RMP ¹⁸
115-208	Arizona	Lower Sonoran RMP
115-238	Arizona	Lower Sonoran RMP
130-131N-S	Colorado	Tres Rios RMP ¹⁹ Uncompahgre Basin RMP ²⁰ Grand National Forests Amended LMP
130-274/ 130-274(E)	Colorado	Tres Rios RMP Uncompahgre Basin RMP [Uncompahgre Draft RMP (BLM 2016)] Grand Mesa, Uncompahgre, and LMP San Juan National Forest LMP ²¹
131-134	Colorado	Grand Mesa, Uncompahgre, and Gunnison National Forests Amended LMP

211. ASNF's Forest Plan Amendment was published and signed until 2015. I will upload the LMP, in case you do not have the final. In the LMP, please see pages 594, 101-103, 111, 116-117, 134-136, 138, 140, 197, and 287. Management entities; siting place in the APS' Land in connection with the new corridor alignment and consensus is that the corridor should stay on centerline of the existing corridor.

discussion among stakeholders about the regional reviews process as well as specific Section 368 energy corridors. Appendix D includes a list of entities that provided input during the stakeholder input periods.

Complete stakeholder input is presented in two separate reports available on the website: *Regions 2 and 3: Stakeholder Input, Section 368 Energy Corridor Review* and [2014 Request for Information: Section 368 Energy Corridors – Written Stakeholder Input](#). Corridor-specific stakeholder input has been incorporated into the corridor abstracts, which were revised and made available on the website in May 2018. Non-corridor-specific stakeholder input on specific topics is summarized below. The Agencies have provided an initial response, but stakeholder input will be considered beyond the regional review. Through the Regions 2 and 3 regional review  the Agencies intend to carry these stakeholder concerns and information forward for review of future projects as well as the future siting of Section 368 energy corridors.

D.3.1 Environmental Concerns


The general environmental and tribal concerns identified for specific Section 368 energy corridors above topics are identified and assessed in the corridor abstracts. Projects proposed within Section 368 energy corridors would require appropriate site-specific environmental review pursuant to the requirements of NEPA and other applicable law and would include an evaluation of the resources listed above, as applicable.

emorgan
2019-09-22 17:45:24

Equals... what?

Items identified below were consistent with the corridors. Corridor-specific concerns that apply to the corridor abstracts. Projects proposed within Section 368 specific environmental review pursuant to the and would include an evaluation of the resources listed

Cultural Resources and Tribal Concerns. Several organizations and Tribal Nations had concerns about how cultural resources would be identified and dealt with at the corridor planning level and during the ROW application process. A concern was identified that the Agencies are required to consider reasonably foreseeable development even if the impacts are outside of the Agency’s jurisdiction. General recommendations proposed by stakeholders included revising corridors to avoid specific properties or resources; applying a Class III cultural resource inventory to corridors with high known-site densities; and assuring that tribes would be involved in ethnographic studies and archaeological surveys and that such studies and surveys be conducted prior to any project approval within Section 368 energy corridors. Tribal Nations advocated for the avoidance of cultural resources (or in-situ reburial of artifacts if avoidance is infeasible), and requested that both be incorporated into mitigation measures for projects within Section 368 energy corridors. Commenters suggested mitigating visual impacts from NRHP properties; and confirming that all potential high conflict areas have been identified. A state agency agreed that impacts on NRHP sites under the Section 106 process is not appropriate for corridor level planning, and should be addressed during ROW application processes. Tribal Nations expressed desire for improved early consultation and coordination to assist in preliminary energy infrastructure routing and design to provide important cultural information to assist proponent(s) and agency(s) in avoiding crossing and or impacting sacred sites, traditional cultural properties, tribal communities and other important areas.

Agency Response: There are existing IOPs related to development within a Section 368 energy corridor.  additional IOP related to ethnographic studies to cultural resources.

emorgan
2019-09-22 17:48:35

Please provide the reference for these. Are they available online? This applies to other existing IOPs as well.

recommendation was proposed that a pipeline notification protocol be implemented for residents who live in close proximity to an existing pipeline or a potentially new pipeline.

Agency Response: The Agencies agree that avoiding resource conflicts to the extent feasible is important during the corridor siting phase; however, corridor designations as a planning tool do not directly impact socioeconomics since the corridors pathways are not “mandatory” and therefore are not a foregone conclusion that future development will occur exactly along those paths. As such, socioeconomic impacts cannot be further analyzed at the macro-scale as there needs to be a definitely proposed project action to assess the potential direct, indirect, and cumulative effects to socioeconomics.

Specially Designated Areas. Some organizations stated that the Agencies should use a consistent approach when addressing intersections with ACECs and other specially designated areas. In cases where it is not possible to revise a corridor to eliminate intersections, the Agencies should commit to adding IOPs that would require mitigation to minimize unavoidable impacts. A state agency made the point that energy corridors frequently coexist with, or are in close proximity to, specially designated areas without any adverse impacts when the corridors are managed correctly.

Agency Response: The corridor abstracts identify where Section 368 energy corridors intersect ACECs and other specially designated areas. The corridor summaries identify where avoidance or exclusion areas intersect the corridors and that conflicting management objectives should be resolved through a corridor revision, revision to specially designated area boundaries (if applicable) or a revision of the management prescriptions.

Visual Resources. A few organizations discussed the importance of preserving and protecting the scenic qualities/visual resources along the corridor routes. One agency was concerned about visual impacts on future residents and visitors and potential impacts on property values and tourism. Requests and suggestions for dealing with visual resources included applying BLM VRM Class I standards to specified corridors; providing more details on potential visual impacts and committing to addressing them through the regional reviews; burying transmission towers; and limiting transmission voltage.

Agency Response: Viewshed analysis would be completed as part of the project-specific environmental review at the time that a project proponent is seeking authorization to use a Section 368 energy corridor for a specific project. In general, Section 368 energy corridors follow existing infrastructure where possible to minimize impacts on visual resources. In addition, the Agencies are developing IOPs that will help address corridor intersects with visual resource objectives.

Water Resources. A few organizations wanted to avoid or minimize impacts on water bodies (particularly fishable waterways) that crossed a corridor. Construction and subsequent maintenance activities could adversely affect the water quality of those waterways and their tributaries.

Agency Response: The concerns brought forward by stakeholders would be addressed at the project specific level through best management practices for water quality.

emorgan
2019-09-22 17:57:59

Which agencies are developing the IOPs? Which agency is seeking authorization to use a Section 368 energy corridor for a specific project? Can we expect to see them? impacts on visual resources. In addition, the Agencies are developing IOPs that will help address corridor intersects with visual resource objectives.

emorgan
2019-09-22 17:59:48

and wild and scenic or eligible wild and scenic rivers.

the location of electrical substations. They also noted that wider corridors provide more flexibility. They also felt that local-level collaboration was important to resolve private land conflicts relative to corridor gaps. Separation distances need to be considered when collocating pipelines and transmission lines within a corridor.

Agency Response: The Agencies agree that maximum flexibility is necessary to maximize utility of energy corridors while minimizing potential resource impacts. Agencies have considered this in the revisions, deletions, and additions to the corridors and have identified actions to be further analyzed at a more local-level during subsequent land use planning efforts before implementing.

Interagency Operating Procedures (IOPs). One environmental organization wanted the Agencies to commit to adding IOPs that would require mitigation to minimize and offset unavoidable impacts on lands with wilderness characteristics, particularly Inventoried Roadless Areas (IRAs). It also wanted the Agencies to make sure that updated IOPs were consistent with applicable law and practice, which requires the use of an ‘avoid, minimize, and offset’ mitigation hierarchy. They suggested incorporating the design features from the Solar Programmatic Environmental Impact Statement into the IOPs. Suggestions for IOPs included: wildlife impacts related to connectivity, migration/movement corridors, compensatory mitigation, non T&E species, and National Historic/Scenic Trails and that overall the Agencies should develop a consistent approach for dealing with resources concerns. Stakeholders recommended that In order to facilitate the application process, proponents should have access to best management practices so that discussions can focus on mitigation measures.

Agency Response: Based on stakeholder concerns and additional review, the Agencies are considering the addition of an IOP for lands with wilderness characteristics. The Agencies are considering the stakeholder suggestions to incorporate the design features from the Solar PEIS into the IOPs (Section 3.4). Avoidance of impacts is the Agencies’ preference, to the extent possible, over minimization and

IM 2018-093.

emorgan
2019-09-22 18:08:28

Jurisdiction. Seve
development in corridor ‘gaps’ (areas
Would it be possible to add a weblink to this
document?
private individuals and other agencies
is have been authorized by their states to design
ting process and where utilities hold special use

that
between designa... development in corridor ‘gaps’ (areas BLM- or USFS-administered lands) would
require coordina... document? private individuals and other agencies. Examples include corridor gaps where
local government... is have been authorized by their states to design... designate and regulate public utility facilities
through a permit... ting process and where utilities hold special use permits and/or water rights.

Commenters were also concerned about the impacts on public and private lands in corridor gaps and wanted the Agencies to use a consistent approach to addressing these impacts. They wanted land that was encumbered by conservation easements to be considered in corridor planning and felt that that corridors with ‘gaps’ that had high-conflict or environmentally sensitive areas should not be designated. One environmental organization wanted the Agencies to add more information on potential conflicts on non-federal lands. One agency wondered why the Federal Energy Regulatory Commission (FERC) was not the lead federal agency.

Agency Response: The Agencies’ legal authority to designate corridors is limited to BLM- and USFS-administered lands and relies on input to that analysis from other Federal agencies, tribes, counties, states, private landowners, and others with regard to lands under their respective jurisdiction. Through this comprehensive stakeholder engagement, the agencies are able to consider concerns and potential issues on non-federal land which are brought forward. The Agencies acknowledge that corridor gaps

of the next regional review. There was a request to extend the comment period and a request to post the comments on the project Web site. Two agencies expressed interest in becoming a Cooperating Agency. Stakeholders also suggested that the Agencies create a clearinghouse of existing information for project proponents and industry.

Agency Response: The regional review process calls for robust stakeholder involvement. Stakeholder engagement is sought by the review process through webinars, public meetings, or press release, coordination with agency regional, state and federal offices, and following the release of Section 368 energy corridor additions, deletions, and additions. Stakeholder input on the potential revisions, deletions, and additions of corridors during the regional reviews. In addition, the project website provides for public information on the Section 368 energy corridors and regional reviews would have been helpful.

GIS Mapping Tool. A few organizations submitted suggestions to reviewing documents because we're trying to meet our targets and reporting on accomplishments before the end of the FY. Some agencies are also have wildfires on the land so the focus is elsewhere and not on the energy corridor. The mapping tool will include polygons and maps. They also include National Recreation Trails, river segments deemed important, Important Bird Areas; National Register of Historic Places, Recreation boundaries; Recreation Opportunity Spectrum, Scenic resources, and National forests that intersect the corridor; all existing inventory information available. The tool will be updated by using the most recent information available.

Agency Response: Data received from stakeholders and other suggested data layers have been incorporated into the Section 368 Energy Corridor Mapping Tool, as appropriate. GIS data is being continually updated as new information is published internally and externally.

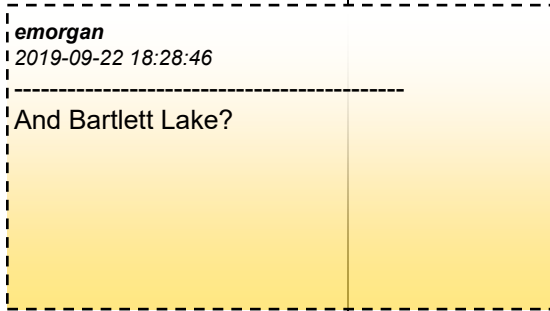
Process. Several organizations stressed the importance of adhering to the terms of the Settlement Agreement and its siting principles as the review process moves forward as well as addressing the need for site-specific NEPA analysis for individual projects. Stakeholder suggested statewide plan amendments for adjusting energy/utility corridors to maximize utility and minimize environmental impacts. There were also concerns that impacts on land and communities, particularly in checkerboard pattern land ownership areas and tribal lands, were not included in the analysis and that land use plans for those areas were not taken into consideration. There should be a more detailed process in the regional reviews for resolving conflicts on lands managed by other agencies. Notification of, and communication with, citizens along corridor routes is important; there should be an open process for determining corridor need.

Agency Response: When considering Section 368 energy corridors for revision, deletion or addition, the Agencies evaluate the corridors by how well they meet the siting principles from the Settlement Agreement (see Chapter 3, Section 3.5 for a evaluation of each corridor). Proposed Section 368 energy corridors would be reviewed pursuant to the requirements of NEPA and other laws. Corridors that cross jurisdiction is limited to BLM and USFS-administered lands. Corridor revisions to BLM-administered lands that shift corridors away from private land to the north? and USFS-administered lands.

emorgan
2019-09-22 18:25:26

I kind of have to agree with the commentor/s. At our June 2018 meeting, requests for continued discussions seemed to have fallen to the wayside and I wasn't notified about the Regions 2 and 3 report until it was ready to review. A little more forewarning like we had for the previous Region reviews would have been helpful. For USFS, this time of year is tough for reviewing submitted sections to coordinate with our reporting on accomplishments before the end of the FY. Some agencies are also have wildfires on the land so the focus is elsewhere and not on the energy corridor.

It is possible, the Agencies have identified state lands to create a more continuous corridor across BLM-

Contemplation of Siting Principles in Developing Potential Revisions, Deletions, or Additions to Regions 2 and 3 Section 368 Energy Corridors				
Section 368 Energy Corridor No.	<i>Corridors are thoughtfully sited to provide maximum utility and minimum impact on the environment</i>	<i>Corridors promote efficient use of the landscape for necessary development</i>	<i>Appropriate and acceptable uses are defined for specific corridors</i>	<i>Corridors provide connectivity to renewable energy generation while considering other sources of generation, to balance renewable sources and ensure safety and reliability of electricity transmission</i>
	riparian and upland wildlife habitat, Mexican Spotted Owl PACS and designated critical habitat, aquatic ESA listed species, Beaver Turkey Ridge Wildlife Quiet Area, Citizen’s proposed wilderness, USFS Roadless Areas and USFS potential wilderness areas, scenic integrity, cultural resource site density, Steep Ridge, Vincent Ranch property, Tonto Village, and intermittent stream crossings.			
80-273 Potential revision	The BLM should consider shifting the corridor to follow an existing pipeline and avoid the Morris 41 ACEC. The suggested corridor alignment revision would maximize utility and minimize impacts by collocating along existing infrastructure while avoiding the ACEC.	The corridor is sited to promote efficient use of the landscape and includes existing infrastructure along almost the entire length of the corridor.	Multimodal (designated for electrical transmission and pipeline projects).	There is potential for future wind development in eastern New Mexico that could use the corridor, providing connectivity to renewable energy generation to the maximum extent possible.
81-213 Potential revision	Transmission lines and natural gas pipelines follow the corridor. A ROW grant has been authorized for the SunZia	The corridor provides a pathway for electrical energy transmission from east to west	Multimodal (designated for electrical transmission and pipeline projects).	The corridor overlaps the Afton SEZ, potentially providing transmission access

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10033] - Webmaster Receipt
Date: Sunday, September 22, 2019 5:10:34 PM
Attachments: [ID 10033 Region 2 Map ASNFCComments.pdf](#)

Thank you for your input, Esther Morgan.

The tracking number that has been assigned to your input is **10033**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 22, 2019 17:10:16 CDT

First Name: Esther
Last Name: Morgan
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Apache-Sitgreaves NFs

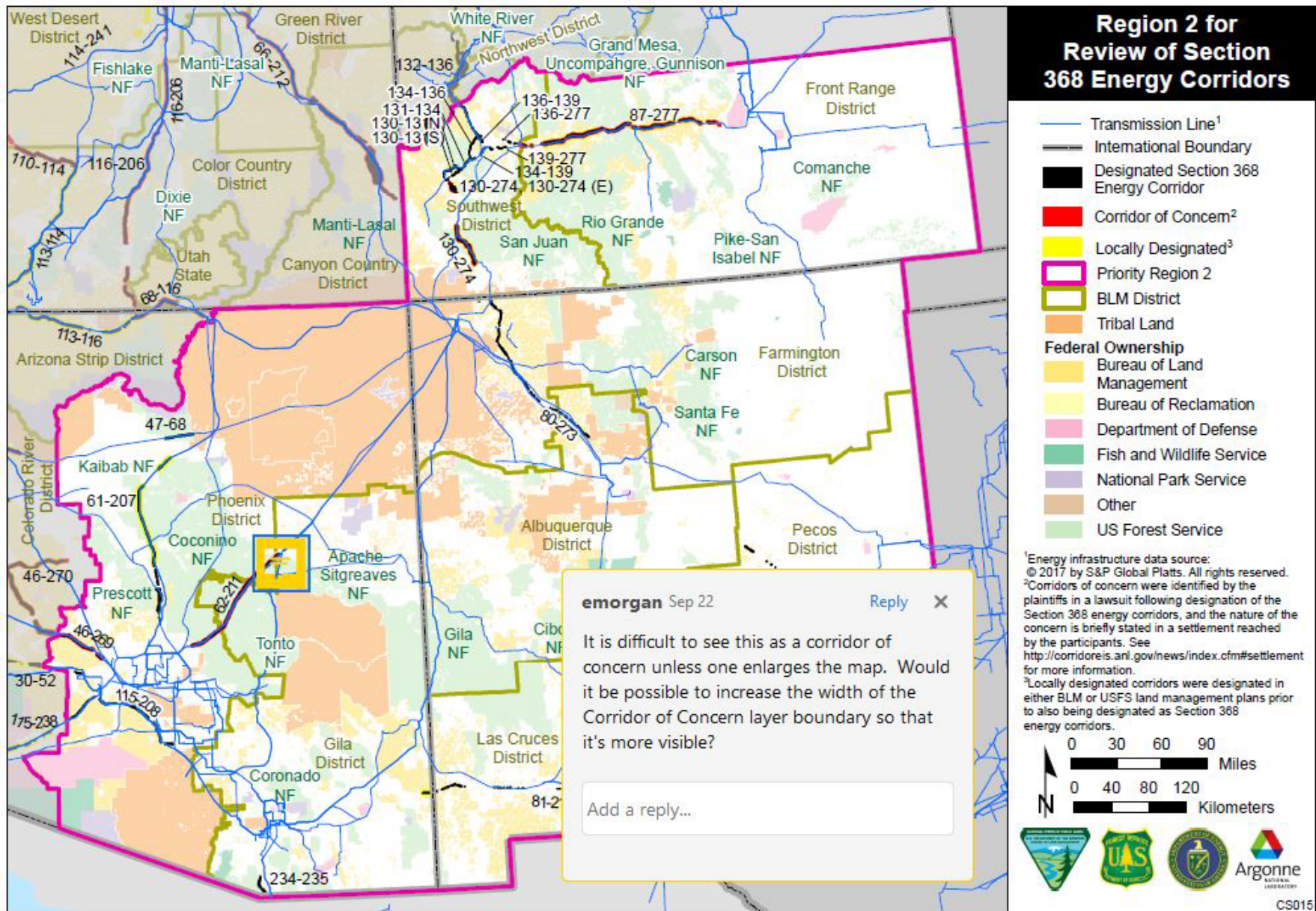
Input

Attached are my comments to the Region 2 map.

Attachments

[Region_2_Map_ASNFCComments.pdf](#)

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10034] - Webmaster Receipt
Date: Sunday, September 22, 2019 5:41:36 PM
Attachments: [ID_10034_corridor62211_ASNFsComments.pdf](#)

Thank you for your input, Esther Morgan.

The tracking number that has been assigned to your input is **10034**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 22, 2019 17:41:21 CDT

First Name: Esther
Last Name: Morgan
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Apache-Sitgreaves NFs

Input

Attached are my comments to the abstract. In addition, one of our Black Mesa RD wildlife biologists, Suzanne DeRosier, was concerned that, "The abstract linked for Corridor 62-211 on the website is dated May 2018. There are errors that I comment on in August 2018, such as ID 62-211.018 where A/S quiet areas are listed under the jurisdiction of the Tonto. But here are other errors on the May 2018 version. Will they make edits to the abstract based on previous comments? Will we have the opportunity to suggest edits on updated draft of the abstract?"

Thank you.

Attachments

corridor-62-211_ASNFsComments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Corridor 62-211

Four Corners-Phoenix Corridor

Corridor Rationale

The corridor provides continued electrical energy transmission from the Four Corners Generating Station to Phoenix, Arizona. Input regarding alignment from the American Wind Energy Association, the Arizona Public Service Electric Company, and National Grid during the WWEC PEIS suggested following this route. Platts data indicate no planned transmission or pipeline projects within the corridor. Concerns identified after the 2009 corridor designation included a perception that the corridor was more aligned to serve coal-generated electricity; however in 2016, Unit 2 of the Cholla Power Plant was shut down and the future of the 3 remaining units is uncertain. In addition, there is currently a proposed wind energy project on the ASNLF that crosses this energy corridor that would benefit from tying into the energy transmission grid at this location. The closure of the coal power plant unit and proposed wind energy project may alleviate the concern. Currently, there are no pending ROW applications for transmission lines within the corridor.

Corridor location:

Arizona (Coconino, Gila, Maricopa, and Navajo Co.)

USFS: Tonto and Apache-Sitgreaves National Forests

Regional Review Region(s): Region 2

Corridor width, length:

Width 3,500 ft

85.7 miles of designated corridor

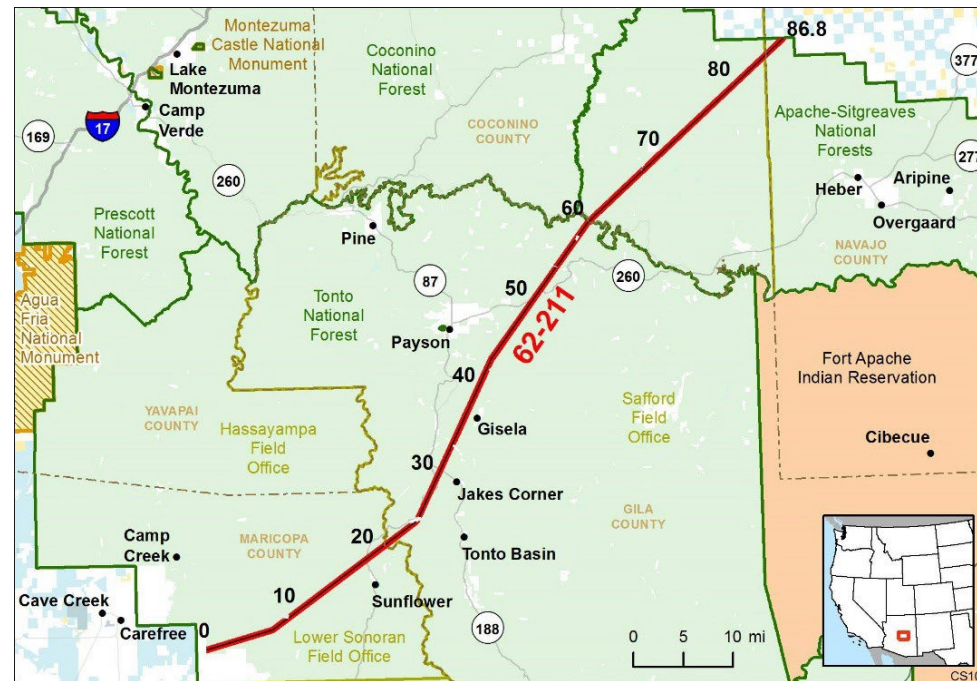
86.8 mile-posted route, including gaps

Sec 368 energy corridor restrictions: (N)

- corridor is multi-modal

Corridor of concern (Y)

- Access to coal plants, impacts to citizen-proposed and designated Wilderness, National Historic Places, Wild and Scenic Rivers, and Mexican Spotted Owl critical habitat.



Corridor history:

- Locally designated corridor prior to 2009 (Y)
- Existing infrastructure (Y)
 - Electric transmission:
 - two 345-kV lines within or immediately adjacent (MP 0 to MP 62) or parallel to the corridor (MP 62 to MP 87)
- Energy potential near corridor (Y)
 - 1 substation in corridor
 - REDA area within 5 mi (MP 87)
- Corridor changes since 2009 (N)

Figure 1. Corridor 62-211

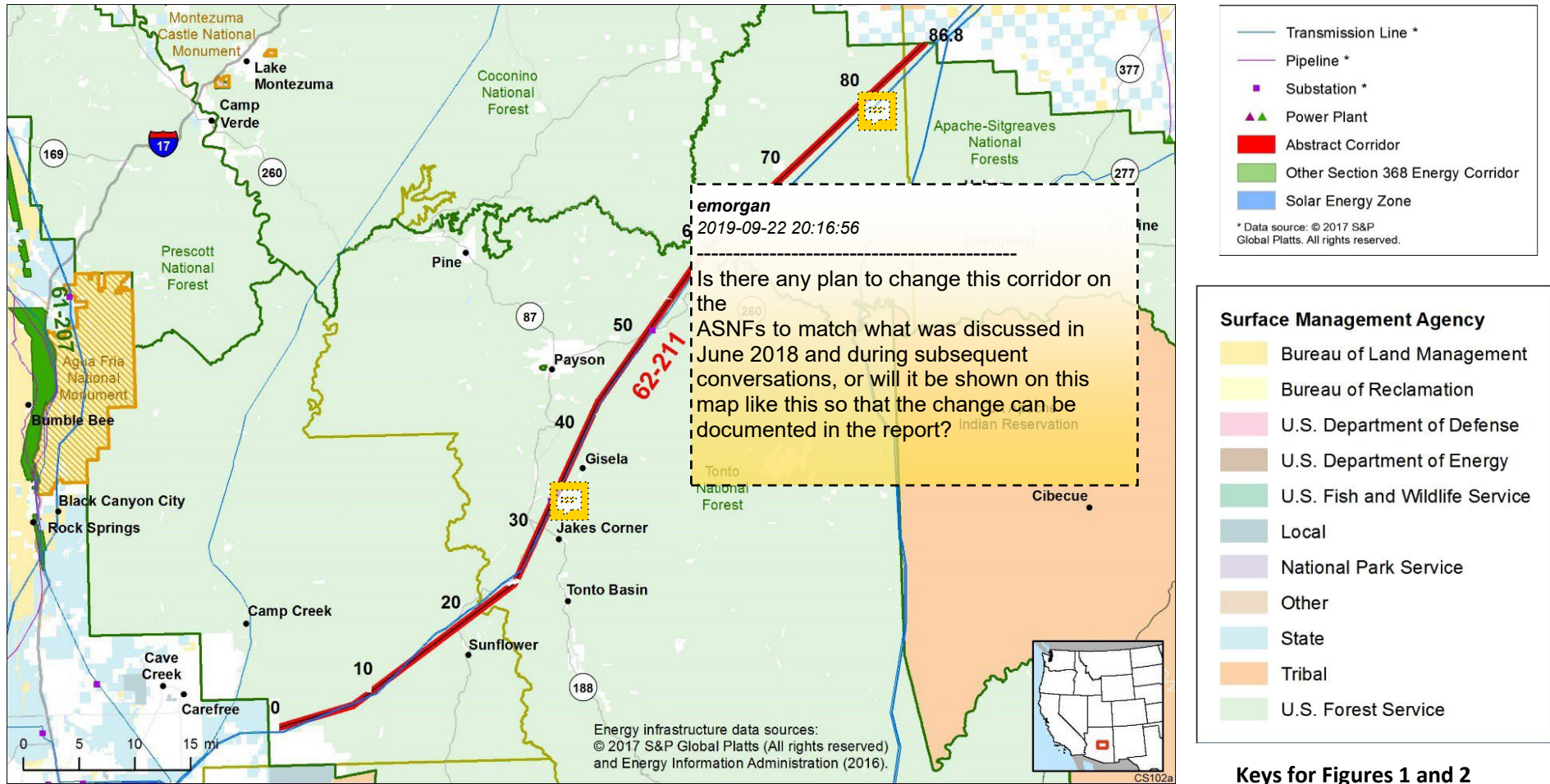


Figure 2. Corridor 62-211 and nearby electric transmission lines and pipelines

CORRIDOR 62-211 REVIEW TABLE							
ID	Agency	Agency Jurisdiction	County	Primary Issue	Corridor Location (by Milepost [MP])	Source	Agency Review and Analysis ^{1,2}
						is significant overlap between the Tonto National Forest's potential wilderness areas and Corridor 62-211. These potential wilderness areas merit special consideration in the forest plan revision to adjust or delete corridors if management decisions are made to protect wilderness character.	
Visual Resources							
62-211 .025	USFS	Apache-Sitgreaves National Forests	Coconino and Navajo, AZ	USFS Scenery Management System	Not specified.	Agency Input: Forest Plan direction for Scenic Resources provides for the protection of scenic resources associated with both WSR corridors and areas classified as primitive and semi-primitive ROS classes.	There is an opportunity to consider revising the corridor to better align with existing infrastructure. (2)
62-211 .026	USFS	Apache-Sitgreaves National Forests	Maricopa, AZ	Scenic Integrity Objective-High	MP 60 to MP 64, MP 67 to MP 68, MP 72 to MP 73, MP 80 to MP 83, MP 83 to MP 87	GIS Analysis: high SIO intersects corridor	There is an opportunity to consider revising the corridor to the east along Coconino County to Maricopa County high SIO areas. (2)
62-211 .027	USFS	Tonto National Forest, Apache-Sitgreaves National Forests	Maricopa, Gila, and Coconino, AZ	Scenic Integrity Objective-Medium	MP 2 to MP 6, MP 12, MP 13 to MP 18, MP 20 to MP 26, MP 35 to MP 40, MP 53 to MP 54, MP 60 to MP 87	GIS Analysis: medium SIO intersects corridor.	Future development within the corridor could be limited. Landscape character appears slightly altered. Noticeable deviations must remain visually subordinate to the landscape character being viewed. There is an opportunity to consider an IOP related to Visual Resources. (2)
62-211 .028	USFS	Tonto National Forest	Maricopa and Gila, AZ	Scenic Integrity Objective-Maximum Modification	MP 0 to MP 6, MP 27 to MP 29, MP 32 to MP 35, and MP 37 to MP 49	GIS Analysis: Maximum modification SIO intersects corridor.	The existing corridor location best meets the siting principles. (1)
62-211 .029	USFS	Tonto National Forest	Maricopa and Gila, AZ	Scenic Integrity Objective-Partial Retention	MP 6 to MP 14, MP 17 to MP 36, MP 42, and MP 45 to MP 58	GIS Analysis: partial retention SIO intersects corridor.	Development allows for moderate change to the characteristic landscape. The corridor meets the siting principles

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10035] - Webmaster Receipt
Date: Sunday, September 22, 2019 5:45:46 PM
Attachments: [ID_10035_FLMP_ASNF_FINAL20150730b.pdf](#)
[ID_10035_20150730ASNFRODFINALsigned.pdf](#)

Thank you for your input, Esther Morgan.

The tracking number that has been assigned to your input is **10035**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 22, 2019 17:45:18 CDT

First Name: Esther
Last Name: Morgan
Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Apache-Sitgreaves NFs

Input

One last upload. Attached is our 2015 Forest Plan. Comments about where the sections that address the energy corridor are with the Region 2-3 report.

Thank you again for this opportunity to provide input.

Attachments

FLMP_ASNF_FINAL20150730b.pdf,20150730ASNF-ROD-FINAL-signed.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



United States Department of Agriculture

Land Management Plan for the Apache-Sitgreaves National Forests

Apache, Coconino, Greenlee, and Navajo Counties, Arizona



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10036] - Webmaster Receipt
Date: Sunday, September 22, 2019 5:46:12 PM
Attachments: [ID_10036_FLMP_ASNF_FINAL20150730b.pdf](#)
[ID_10036_20150730ASNFRODFINALsigned.pdf](#)

Thank you for your input, Esther Morgan.

The tracking number that has been assigned to your input is **10036**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 22, 2019 17:45:38 CDT

First Name: Esther
Last Name: Morgan
Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Apache-Sitgreaves NFs

Input

One last upload. Attached is our 2015 Forest Plan. Comments about where the sections that address the energy corridor are with the Region 2-3 report.

Thank you again for this opportunity to provide input.

Attachments

FLMP_ASNF_FINAL20150730b.pdf,20150730ASNF-ROD-FINAL-signed.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Record of Decision for the Apache-Sitgreaves National Forests Land Management Plan

Apache, Coconino, Greenlee, and Navajo Counties, Arizona



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10037] - Webmaster Receipt
Date: Sunday, September 22, 2019 6:17:09 PM
Attachments: [ID 10037 Paqes34and35oftheCorridorSummaries.docx](#)

Thank you for your input, Esther Morgan.

The tracking number that has been assigned to your input is **10037**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 22, 2019 18:16:49 CDT

First Name: Esther
Last Name: Morgan
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Apache-Sitgreaves NFs

Input

Attached are my comments to the 62-211 corridor that is in the Regions 2 and 3 Corridor Summaries. Due to the size of the document, screen shots were taken of the comments (pp. 34 and 35). Again, thank you for giving us the opportunity to provide comment.

Attachments

Pages 34 and 35 of the Corridor Summaries.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

Page 34 of the Corridor Summaries

Regions 2 and 3 Corridor Summaries

Potential Corridor Modifications Summary and Rationale

- Shift the corridor between MP 60 and MP 87, less than one mile east and south along the existing 345-kV transmission line so that the existing line is the northern boundary of the corridor rather than to the north of the existing corridor. (Figures 3.5-14a, b and c).
- Implement minor adjustments as appropriate to improve corridor alignment to better follow existing infrastructure and allow maximum future build out capacity (see Chapter 3, Section 3.2).
- Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management (see Chapter 3, Section 3.3).
- The corridor designation and the scenic integrity objective (SIO) have conflicting management objectives.

The potential corridor revision would allow maximum future build out capacity and avoid impacts to some sensitive resources. The corridor provides continued electrical energy transmission from the Four Corners Generating Station to Phoenix, Arizona. Following the best terrain and aligning new ROWs parallel to existing infrastructure should help avoid topography concerns associated with the current corridor alignment. The proposed corridor alignment revision would avoid potential impacts on General George Crook NRT, the Mogollon Rim, Chevelon Creek Eligible WSR, Chevelon Crossing, aquatic ESA listed species, Citizen’s proposed wilderness, USFS Roadless Areas and USFS potential wilderness areas, scenic integrity, cultural resource site density, Steep Ridge, and the Vincent Ranch property. The corridor revisions would support connectivity to multiple energy generation sources. A proposed wind energy project on the Apache-Sitgreaves National Forest crosses the corridor that would benefit from tying into the energy transmission grid at this location. If authorized, windmills and associated infrastructure will run parallel to the Mogollon Rim escarpment.

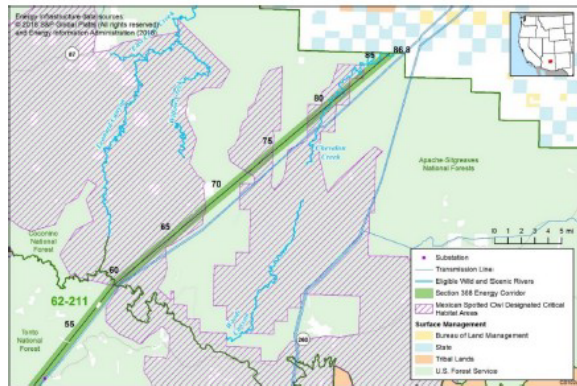


Figure 3.5-14b. Corridor 62-211, as designated.

emorgan 3:58 PM Reply X

MP 55.5, instead of MP 60 to accommodate the climb up the Mogollon Rim. As discussed in June 2018, FS and APS agreed that the corridor climbing the Mogollon Rim escarpment is limited to the existing powerline location.

Post

emorgan 4:03 PM Reply X

Space needed.

Post

emorgan 4:00 PM Reply X

Also provide the option for keeping the corridor centered on the existing corridor, per Forest Plan.

Post

Regions 2 and 3 Corridor Summaries

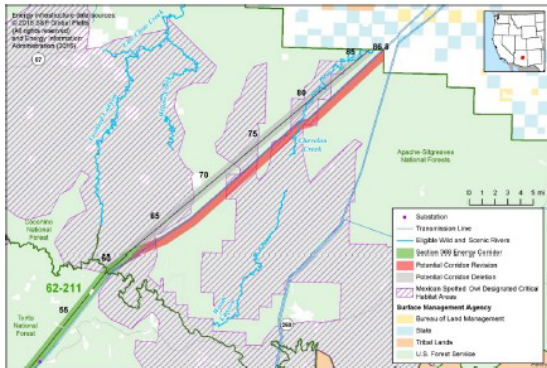


Figure 3.5-14c. Potential Revision to Corridor 62-211.

Interagency Operating Procedures (IOPs)

Revisions, deletions, and additions to IOPs are discussed in Chapter 3, Section 3.4. For Corridor 62-211, specific issues that would be addressed through proposed IOP revisions or additions include:

- The Arizona NST, General George Crook NRT, and the Mogollon Rim intersect the corridor. The potential corridor revision would avoid some of these impacts, but a new IOP for NSTs and NHTs and a new IOP related to visual resources could ensure appropriate consideration occurs with proposed development within the energy corridor.
- MTR-IR and VR intersect the corridor. A revised IOP for DoD coordination that includes height restrictions could help minimize impacts on military training activities.

Corridor Abstract

Comprehensive background information and the Agency’s review and analysis of the existing corridor can be located in Corridor Abstract 62-211 which is available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>.

emorgan 4:03 PM Reply X

Please provide a reference to where the existing IOPs can be found.

Post

Add a reply...

Post

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10038] - Webmaster Receipt
Date: Monday, September 23, 2019 2:30:46 PM
Attachments: [ID_10038_WestWideEnergyCorridors_CPWComments.pdf](#)
[ID_10038_CPW2019WestWideEnergyCorridorReview_Attachments.pdf](#)

Thank you for your input, Dan Prenzlow.

The tracking number that has been assigned to your input is **10038**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 23, 2019 14:30:21 CDT

First Name: Dan

Last Name: Prenzlow

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Colorado Parks & Wildlife

Input

[Blank]

Attachments

West Wide Energy Corridors_CPW Comments.pdf,CPW 2019 West Wide Energy Corridor Review_Attachments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

STATE OF COLORADO

Bill Ritter, Jr., Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE

AN EQUAL OPPORTUNITY EMPLOYER

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February 13, 2008
Argonne National Laboratory
9700 South Cass Ave. Building 900. Mail Stop 4
Argonne. IL 60439

Re: Programmatic Environmental Impact Statement, Designation of Energy Corridors on Federal Land In the 11 Western States (DOE/ EIS **0386**)

Dear Argonne,

The Colorado Division of Wildlife (CDOW) appreciates the opportunity to comment on the Programmatic Environmental Impact Statement (PEIS), for the Designation of Energy Corridors on federal Land in the 11 Western States (DOE/EIS 0386), October 2007 Draft. CDOW recognizes the mandate of this PEIS to comply with the Energy Policy Act of 2005 to delineate potential future lands for west wide energy transmission.

CDOW acknowledges there could be a benefit of this PEIS if energy development activity is optimized through consolidation of energy corridors. However, consolidation is only beneficial provided that the width doesn't expand so much that wildlife movements are impaired. Designation of the energy corridor could be beneficial if it provides a mechanism for transmission of energy from renewable resources. CDOW also acknowledges that designating areas for energy transmission may be important to maintain safe and reliable energy transmission throughout the west. However, if designating these energy corridors telegraphs into 20 years of chronic disturbance within the energy corridors, then CDOW will likely have significant concerns for wildlife proximity to the energy corridors.

Because the PEIS only considers Federal lands and no impacts were directly evaluated, it is challenging to compile comments with great specificity regarding impacts to wildlife and natural systems. Many of the private lands contain important habitat such as: riparian areas, winter range, sage-grouse habitat, etc. which are extremely valuable to wildlife and often equally as important as their habitats on federal lands. CDOW intends to engage in review of site specific proposals for energy transmission authorizations as they are made available to ensure critical and important habitats are not irreparably harmed, are not subject to continual disturbances, and that unreclaimed habitat losses are ultimately compensated for.

CDOW has several primary concerns regarding this PEIS:

The first CDOW concern involves the PEIS National Environmental Policy Act (NEPA) processes in general, the proposed alternatives and purpose and need statement. The impacts of this proposal were difficult to analyze because there is insufficient detail regarding the nature and extent of potential future impacts resulting from development within energy corridors.

Only two alternatives were scoped in the PEIS the no action and proposed action alternatives. Two Alternatives appears to be an inadequate range of potential actions. Especially since the proposed action would conceivable delineate the preferred locations for potentially numerous future energy right-of-way (ROW) authorizations. Furthermore, the proposed action evaluates “mitigation and minimization” measures, but does not evaluate “avoidance.” Specifically an alternative that contemplates and analyzes “avoidance” of critical, economically important, sensitive and unique wildlife habitats would be highly beneficial, and subsequently aligned with the CDOW’s perceived objectives of NEPA. The PEIS does state, however, that sensitive areas such as national parks, wilderness study areas, historic trails, etc. were avoided. While this is advantageous, CDOW strongly encourages evaluation and analysis of sensitive and irreplaceable wildlife habitats at a much finer programmatic scale and should include at a minimum: wetlands, riparian areas, black-footed ferret reintroduction areas, greater sage-grouse leks, breeding and nesting habitat, big game winter ranges, migration corridors, parturition areas, etc.

CDOW has developed a composite map of these sensitive wildlife habitats (See Attachment 1) to delineate the areas of greatest wildlife value, and therefore concern of CDOW. A significant number and lineal extent of the proposed corridors are coincident with these sensitive areas. These species and seasonal activity used to develop this map are described more fully in High Priority Habitat table attached to this letter (See Attachment 2). Those species or seasonal activity areas which receive scores of 9 or 10 (Very High) are shown in blue on the attached composite map. An alternative that evaluates more fully “avoidance” and less bifurcation of these important habitats would result in a more comprehensive analysis than is currently scoped by the proposed action.

The PEIS states that energy transport system redundancy and system failures are of concern. Perhaps an alternative should scope consideration of larger, more singular pipeline systems and processing plants.

No Action Alternative. The process of designating a corridor does not have an effect and there will be no direct environmental impacts; however, the final outcome will likely have an impact on the landscape and wildlife. Repeatedly throughout the PEIS it is implied that the No Action alternative will have a greater impact on ecological resources than the proposed action alternative.

Proposed Action Alternative. “For multiple projects, potential impacts may occur at fewer locations and over a smaller geographic area than under the no action alternative.” However, multiple projects developed at the same or nearby locations over a period of time produce impacts once ecological resources which collectively accumulate. The PEIS does not adequately address how cumulative impacts will be assessed and ultimately mitigated for. It is not stated if project proponent performance (for example reclamation success or weed mitigation) will factor into approval of future ROW authorizations. Or, whether future ROW authorizations simply continue to undergo an administrative review and are afforded an expedited approval process. Will cumulative impacts be evaluated on a project by project basis, or does the PEIS circumvent future NEPA project scoping through federal agency administrative review and eliminate future opportunity for public comment?

CDOW reacted strongly to the statement that designation of an energy corridor has “no impact.” Although a corridor designation in and of itself does not immediately translate to a ground disturbance, the corridors are areas where future ground disturbance is encouraged and consequently “expedited.” It is almost as if the energy corridor designation condemns the lands to repeated future disturbance. This could be problematic from a wildlife management standpoint if the disturbances are chronic and not properly mitigated.

There are no data to specifically suggest that the proposed action alternative is more beneficial than the no action alternative. However, one of the sited objectives is to expedite or improve the efficiency of future actions, and improve coordination. CDOW encourages improved coordination and routinely participates in projects such as these as a cooperating agency. The PEIS states that future utilities are not required to be built within the energy corridor. There are many pros and cons to this and it seems to be counterproductive if the purpose of the designation is to increase efficiencies. The advantages of co-location of utilities (to lessen ecological impacts) would be negated if extensive disturbances associated with energy corridor construction are permitted within and outside of the designated energy corridor.

Since no actual data are included in the PEIS/NEPA analysis, the potential magnitude of a corridor that is 3,500 to 26,000 feet wide are not adequately addressed with respect to the influence of that much disturbance to wildlife and other natural systems. Furthermore the PEIS states that “the scope of the analysis in the PEIS includes an assessment at any positive and negative environmental, social and economic impact of the alternatives.” The analysis in the PEIS appears to fall short of this mark. For example, CDOW acknowledges advantages of predictability of future energy related authorizations; however, this also means the areas are almost predisposed to repeated perturbations. Consolidation of energy corridors could prove valuable if it serves to consolidate ROWs. CDOW recommends that disturbances be replaced and compensated for through in kind or greater replacements (for example replace wetland vegetation at a 2:1 ration and mitigate disturbance within winter range at 10:1 ratio).

The PEIS did not consider corridors located on private lands. Therefore, all contemplated impacts to ecological systems are **greatly** underestimated in this PEIS. Private lands in Colorado often provide critical and irreplaceable wildlife habitat. Although CDOW acknowledges the difficulty of this, the analysis could be flawed if private lands ROW agreements cannot be obtained, causing a shift in the corridor location. Furthermore, it is apparent that the energy corridors would likely cross four State of Colorado State Wildlife Areas (SWA): Escalante, Piceance, Junction Butte, and Bitterbrush. Data must be extrapolated to determine where corridors cross private lands, but it is evident the energy corridors are planned to cross these SWAs.

A **second** major CDOW concern includes the expediting of future ROW authorizations. CDOW is concerned that the identification of energy corridors in this PEIS will effectively condemn the lands under consideration. The PEIS states that “applicants would not be required to follow corridors, but if they did then projects would be expedited.” This is disturbing because specificity is lacking in the PEIS yet, apparently there is sufficient detail to “expedite” future authorizations. It is unclear whether the PEIS conveys an almost automatic legal right to develop an area within the corridor?

A third major CDOW concern includes excessive ROW widths stipulated in the PEIS, It is unclear whether gas carrying agreements or pipeline consolidation will be one of the outcomes encouraged by this PEIS. The project could be beneficial if facilities were streamlined and disturbances consolidated. **However, in many cases, the energy corridor width is excessive and could therefore negatively impact wildlife.** The PEIS indicates that corridor widths can vary from 200 feet to 5.5 miles. For example, a corridor width of 26,000 feet is proposed near the western flank of Grand Mesa. This appears to be a great range of widths. Further, a 26,000 foot energy corridor on the western flank of the Grand Mesa near Palisade Colorado is excessive and unacceptable, as this areas includes big game elk winter range, critical winter range, and transitional range. Presence of extensive utilities could become a barrier to movement by wildlife.

In addition, two of the energy corridors in Colorado have variable widths, Section #126-133 has a width spanning from 3,500 to 9,000 feet and section #132-133 has a width ranging from 2,250 to 10,500 feet. The wide degree of width variability makes assessing impacts resulting from ground or noise disturbance, on sensitive species and big game habitat problematic. CDOW implores DOE/DOE to narrow the energy corridor width as much as possible within the State of Colorado.

Furthermore, it seemed like an omission that the I-70 corridor (where there might be viewshed issues) was not considered for designation of an energy corridor. This area is the location of so many utilizes and extensive disturbance has already and continues to occur. Conversely an energy corridor is designated within the Gunnison Basin, which has not experienced much disturbance. The PEIS indicates that this corridor could represent and “Unrestricted” west-wide conceptual network of energy transport paths.

A **fourth** major CDOW concern includes issues with performance standards. Performances based standards need to be established ahead of site specific project approval which:

- a. Establish desired conditions that should be maintained or restored post development.
- b. Assist in assurance that the desired conditions are being met.
- c. Establish potential mitigation options to offset unavoidable impacts.
- d. Establish a plan for monitoring efficacy of mitigation measures.
- e. Establish a mechanism for applying adaptive management principles if objectives are not achieved.

The PEIS does not disclose what the long term expected surface use or anticipated surface condition of the lands will be within these energy corridors. The PEIS “encourages consultation with other agencies.” And CDOW encourages consultation whenever possible. Likewise biological assessments and opinions prepared for energy development projects should also be made available to CDOW for review and comment. The PEIS indicates that the BLM and Forest Service have “active wildlife management programs which include 1) maintaining, improving, and enhancing wildlife species diversity, and 2) restoring disturbed and altered habitat to obtain desired native plant communities.” The increase in energy development projects landscape-wide prioritizes the need for such programs now more than ever.

CDOW is concerned about the nebulous but inevitable future connected actions likely to result from this PEIS. These connected actions elevate the importance of reclamation standards and methods for reclamation success assessment to manage the impacts of multiple energy development projects. Reclamation is often challenging, especially in the midst of persistent drought conditions. Soils within the State of Colorado often contain high salt content and topsoil is often sparse. Conservation of available topsoil is imperative for successful reclamation, and soil amendments that may be necessary to achieve successful reclamation. Furthermore, suitable seedbed material may need to be imported in order to accelerate reclamation.

Many of the Bureau of Land Management’s Resource Management Plans (RMPs) are outdated and consequently undergoing revision. For example several local RMPs are dated: Little Snake RMP 1989, Kremmling RMP 1984, White River RMP 1997, San Juan/San Miguel RMP 1985, and Uncompahgre Basin RMP 1989. Because these RMPs are outdated most energy corridor widths will likely default to 3,500 feet, which is intolerable for some habitats (riparian areas) and species (sage-grouse).

None of the RMPs have adequately quantified cumulative impacts of ongoing energy-related development. Cumulative impacts must truly be evaluated and assessed within temporal and spatial boundaries of the defined energy corridors. The discussion in the cumulative impacts section within the draft PEIS lacks sufficient detail and analysis to evaluate how the cumulative impacts to wildlife resources will be assessed by future site-specific projects.

A **fifth** major CDOW concern includes impacts to sensitive resources and species, new science regarding sensitivity of species and encroachment on roadless areas.

To reiterate, all assessed impacts described below are likely to be greatly underestimated since the information provided in the PEIS was inadequate to determine which private lands would be affected by the proposed corridor and to evaluate the resulting degradation and loss of wildlife habitat.

It seems a generous conclusion of the PEIS to profess a “no effect” determination on Section 7 of the Endangered Species Act (ESA). However, some of the listed impacts to ecological resources include: “habitat fragmentation, wildlife disturbance, habitat loss and modification.” Furthermore, the PEIS states that 390 miles of surface waters would be crossed and intersected in the State of Colorado. This seems excessive.

The PEIS indicates that the scale is not defined enough to determine roadless areas that may be impacted and is assumed to not evaluate which species or habitats could be impacted. The PEIS needs to consider federal and state listed threatened and endangered and sensitive species. Some of the species being evaluated by the U.S. Fish and Wildlife Service (USFWS) for a listing decision that would be impacted by development within the corridors include white-tailed prairie dog (*Cynomys leucurus*), greater sage-grouse (*Centrocercus urophasianus*), Gunnison’s sage-grouse (*Centrocercus minimus*), and Gunnison prairie dog (*Cynomys gunnisoni*). Federal, state and local conservation plans have been completed or are being completed for many of Colorado’s threatened and endangered and sensitive species impacted by the proposed energy corridor. They include: greater sage-grouse, Gunnison sage-grouse, Columbian sharp tailed grouse (*Tympanuchus phasianellus columbianus*), lesser prairie chicken (*Tympanuchus pallidicinctus*), river otter (*Lontra canadensis*), Colorado River cutthroat trout (*Oncorhynchus clarki pleuriticus*), humpback chub (*Gila cypha*), bonytail chub (*Gila elegans*), razorback sucker (*Xyrauchen texanus*), Colorado pikeminnow (*Ptychocheilus Lucius*) and

boreal toad (*Bufo boreas boreas*).

The proposed corridor location and width will have many impacts on wildlife species across Colorado including: habitat fragmentation, loss, and degradation, potential for invasive weed establishment, and potential animal movement barriers. Increased human disturbances can be expected. Within increased human activity from corridor construction and maintenance there can be expected increase in noise, vehicle (trucks and off-road) use, and potential access to areas. Any industry that is largely comprised of a transient workforce can increase poaching incidents. ROWs can also create a path of least resistance for predators to access prey more easily.

Gunnison and Greater Sage-Grouse. The proposed corridors, identified on public lands, cross valuable habitat and specifically breeding grounds of the greater and Gunnison sage-grouse. Both species are considered sensitive species by BLM and species of special concern by CDOW. Both have been petitioned for listing under the ESA in recent years. USFWS listing decisions for greater and Gunnison sage-grouse are being challenged in court. Neither greater nor Gunnison sage-grouse became a major conservation issue until well after the completion of local RMP documents were written. BLM participated in the development of and is a signatory to the Gunnison Sage-grouse Rangewide Conservation Plan, completed in 2005 and the Colorado Great Sage-grouse Conservation Plan, completed January 2008 and awaiting signature. Both plans call for expansion of current sage-grouse protections [e.g., 0.6 mile no surface occupancy (NSO) around leks and expansion of nesting habitat timing limitations within a 4-mile radius]. The CDOW and BLM have invested substantial resources to protect and improve habitat for these species.

Within the identified corridor is valuable breeding, nesting, summer and winter habitat for both grouse species. The corridor travels thru the heart of the greater sage-grouse occupied range for Parachute/Piceance/Roan, Northwest and Middle Park populations. Five active greater sage-grouse leks are directly crossed by the corridor. Specifically, 3,100 acres within lek protection NSO areas (within 0.6 miles of an active lek). 27,162 acres of winter range and 40,709 acres of overall range for Greater sage-grouse coincide with the proposed energy corridor.

Two active Gunnison sage-grouse leks are crossed by the proposed corridor and 2,600 acres within lek populations NSO areas. 18,838 acres of winter range and 21,802 acres of overall range are within the corridor. Populations impacted include Gunnison, Cerro/Cimarron/Sims and San Miguel; specifically, the Miramonte and Hamilton sub-populations within the San Miguel population. Corridor segments that cross Gunnison sage-grouse occupied range includes 130-274, 136-277, and 87-277.

At BLM request, CDOW analyzed and developed greater sage-grouse core areas (that area encompassing 50% of the breeding males in each population) and proposed using these areas as temporary refuges to maintain sage-grouse populations while oil and gas development proceeded in less important adjacent habitats. Several corridor segments cross core areas identified for greater sage-grouse: 126-133, 132-133, 73-133, 138-143, and 144-275. The energy corridors located within sage-grouse core areas would make application of the core area concept difficult, especially if other development disturbances are added to the total disturbance cap recommendation.

Available evidence indicates that sage-grouse are highly sensitive to even low intensity disturbance associated with energy development, particularly on leks and breeding areas but also on winter range. Impacts to sage-grouse from the proposed corridor may include (1) increased ground and aerial predation; (2) direct habitat loss from range condition changes; (3) direct mortality during development and collisions with power lines; (4) loss of breeding grounds; and (5) increased disturbance during breeding and brood-rearing seasons.

CDOW recommends timing restrictions on disruptive surface activities during the lekking, nesting and brood rearing period, minimizing human presence using available technology and timing restrictions, and restore native vegetation to disturbed areas. Additional recommendations and strategies for grouse in relation to energy corridors and disturbances are located within the Colorado Sage-Grouse Conservation Plan, specifically in the Strategy Section and Appendix B: Greater Sage-grouse Disturbance Guidelines (2008) and in the Gunnison Sage-grouse Rangewide Conservation Plan (2005).

Recommendations for corridor development in sage grouse range include:

- No surface occupancy (NSO) within 0.6 miles of sage grouse lek.
- No development or construction activity within winter range from 1 December to 15 March.
- No development or construction activity during the nesting period of 1 March through 30 June within 4 miles of a lek.
- Operation and maintenance activities near leks should not occur between 3:00 a.m. and 9:00 a.m. during breeding season (1 March to 15 May) to prevent disturbance to birds on leks.
- Core areas are not be developed at greater than a 1% surface disturbance.

Columbian sharp-tailed Grouse. Columbian sharp-tailed grouse in Colorado are currently located only in Routt, eastern Moffat, and northern Rio Blanco counties. The species has twice been petitioned for federal protection under ESA. Additional listing petitions are likely. The Columbian sharp-tailed grouse is considered a sensitive species by BLM and a species special concern by CDOW. The Columbian sharp-tailed grouse conservation plan is currently being updated to develop strategies to reduce impacts from unexpected levels of oil and gas development.

The Columbian sharp-tailed grouse occupied range is fragmented by a north/south and west/east running corridor (segments 132-276, 138-143, 144-275). The corridor coincides with 5,919 acres of occupied range and 2,988 acres of winter range. Similar to sage-grouse, sharp-tailed grouse are sensitive to noise and ground disturbances. Impacts to sharp-tailed grouse from the proposed corridor may include (1) increased ground and aerial predation; (2) direct habitat loss from range conditions changes; (3) direct mortality during development and collisions with power lines; (4) loss of breeding grounds; and (5) increased disturbance during breeding and brood-rearing seasons.

Recommendations for corridor development in Columbian sharp-tailed range include:

- NSO within 0.4 miles of a lek.
- No development or construction activity within winter range from 1 December to 15 March.
- No development or construction activity during the nesting period of 1 March through 30 June within 1.25 miles of a lek.
- Operation and maintenance activities should not be conducted near leks between 3:00 a.m. and 9:00 a.m. during breeding season (1 March to 15 May) to prevent disturbance to birds on leks.

Boreal Toads. The boreal toad occurs from 7,000 – 12,000 feet in elevation throughout the Southern Rocky Mountains. Once common, they have experienced a dramatic decline in population over the past two decades. The boreal toad is presently listed as an endangered species by the state of Colorado. The USFWS had classified the species as “warranted but precluded” for ESA listing. However, this designation was recently removed while the distinctness of the Southern Rocky Mountain population is reevaluated. Boreal toad habitat coincides with the energy corridor in Grand and Summit Counties. It is recommended in these areas that the narrowest width possible is applied.

Recommendations for corridor development in boreal toad range include:

- NSO within ½ mile of identified breeding sites.

Black-footed Ferrets. The black footed ferret (*Mustela nigripes*) is considered the rarest mammal in North America and is listed by the USFWS under the ESA as an endangered species. Colorado is one of several states involved with the recovery of black-footed ferrets. 237 animals have been released in Coyote Basin and Wolf Creek in northwestern Colorado from 2001-2007. The reintroduction effort in northwest Colorado and northeast Utah has been a cooperative effort between BLM, CDOW, USFWS, and Utah Division of Wildlife Resources. In 2007, 16 individuals were confirmed during surveys; including five kits from four different litters. The proposed energy corridor bisects the black-footed ferret Wolf Creek reintroduction area in Colorado. Approximately 7,200 acres are impacted by the energy corridor. This segment, 126-133 includes a variable width from 3,500 to 9,000 feet.

Recommendations for corridor development in black-footed ferret reintroduction areas include:

- Avoid prairie dog colonies that have been documented black-footed ferret sightings.
- Limit development of new roads with the Wolf Creek and Coyote management areas.
- Limit speed limit to 25 mph from dusk to dawn.
- Close any new roads created by energy transmission projects within the corridors to unauthorized travel.

White tailed and Gunnison's Prairie Dog. Both prairie dog species were petitioned for listing under the ESA; white-tailed prairie dog in 2002, and Gunnison's prairie dog in 2004. Following 2 years of review for each petition, the USFWS determined that both petitions lacked substantial scientific information to warrant listing and negative 90-day findings for both species. As a result of the lawsuits, the USFWS reconsidered its decision and has agreed to conduct a 12 month status review on white-tailed prairie dogs in 2009. A court ordered settlement on Gunnison's prairie dog resulted in the USFWS conducting a 12 month status review for the species in late 2007. The final federal register notice on this decision was published February 5, 2008 with the result that the montane portion (mostly in central and southwestern Colorado) of the Gunnison's prairie dog range is "warranted" for listing as a threatened or endangered species under the ESA but preclude by higher listing priorities. This decision results in the Gunnison's prairie dog being a 'candidate' species for listing. Annual reviews will be conducted on the status of the species.

Approximately 68,000 acres of white-tailed prairie dog and 32,000 of Gunnison's prairie dog occupied range will be potentially impacted by the energy corridor. The corridor bisects the montane portion of Gunnison's prairie dog population in Colorado. The USFWS determined that in this portion of the Gunnison's prairie dog range, threats are of a high magnitude and are imminent.

Possible direct adverse impacts to prairie dogs associated with pipeline development include (1) clearing and crushing of vegetation; (2) reduction in available habitat due to construction and road and pipeline development; (3) fragmentation of available habitat; (4) displacement and killing of animals; (5) alteration of surface water drainage; and (6) increased compaction of soils.

Indirect effects of energy development on prairie dogs and their ecosystem include (1) increased exposure to shooters and OHV users because of improved access into remote areas; (2) invasion of habitat by invasive and noxious weed; (3) behavior alteration; and (4) effects on associate species. Shooting pressure is most likely to increase due to easier road access, as compared to more remote colonies.

Recommendations for pipeline development in white-tailed prairie dog or Gunnison's prairie dog range include:

- Minimize current and future Gunnison's prairie dog and white-tailed prairie dog habitat loss and degradation using temporal and spatial planning; include components related to connectivity.
- Develop potential mitigation measures (e.g. speed limits, seasonal road closures) to improve habitat connectivity with Gunnison's prairie dog and white-tailed prairie dog range.
- Minimize impacts to Gunnison's prairie dog and white-tailed prairie dog by adjusting size, location, and pipeline construction based on topographic features and prairie dog colony location.
- Ensure rapid interim reclamation and revegetation with native weed-free seed in Gunnison's prairie dog and white-tailed prairie dog habitat.
- Maintain reclaimed areas as weed-free sites within Gunnison's prairie dog and white-tailed prairie dog habitat.
- Avoid construction on or in prairie dog colonies wherever possible.
- Avoid constructing pipelines in Management Emphasis Areas described in the Colorado statewide conservation plan (currently being written).
- Avoid construction activities within and over active prairie dog colonies from 1 March to 30 June.

Kit-Fox. The kit fox (*Vulpes macrotis*) is listed as endangered in Colorado and is considered one of the state's most vulnerable animals. Though probably never very common in the state, survey work completed in the mid-1990s estimated a population of less than 100 individuals (Fitzgerald 1996). Follow up surveys ending in 2000 (Beck from 1997-2000) suggested that the already small kit fox population in Colorado had declined substantially and the species was close to extirpation. In 2007 CDOW completed a track plate survey of the species and found only one track during a survey effort of 700 trap nights. In the past, the kit fox was subject to multiple threats including bounty hunting, carcass poisoning, and unregulated hunting. Today, threats include habitat loss, interspecific competition with coyotes and red foxes, disturbance from off-road vehicle use, decline in prey abundance, and urban encroachment (Mearney et al. 2006).

The energy corridor in Mesa and Delta Counties bisects over 14,200 acres of kit-fox occupied range. The segment 132-136, in Mesa County, has a width of 21,120 feet, while the adjoining segment 132-136 has a width of 3,500 feet. Segment 132-136 is excessively wide. Corridor width should be restricted to the narrowest width possible. Impacts of the corridor on kit fox may include (1) increased mortality from vehicular collisions; (2) habitat degradation; and (3) potential for behavioral change due to increased human disturbances.

Recommendations for corridor development in kit fox range include:

- Pre-development surveys in the development area to locate den and foraging sites to avoid disturbances.
- At den sites, no construction or development activity within ¼ mile of den sites between 1 February and 1 May.

Big Game. The majority of the proposed energy corridors in Colorado coincide with mule deer (*Odocoileus hemionus*), elk (*Cervus canadensis*), bighorn sheep (*Ovis Canadensis*) and/or pronghorn antelope (*Antilocapra americana*) winter range and migratory corridors, particularly sensitive habitats for these economically and recreationally important species. Development impacts in migratory corridors have magnified effects beyond the local area due to use by migrating animals from considerable distances away. The energy corridors north and west of Rangely (variable width, from 3,500 up to 9,000 and 10,200 feet) and on the western flank of Grand mesa (26,000 feet wide) are excessively wide overlaps of big game winter range. The majority of the proposed corridors is considered elk and mule deer overall range. Critical mule deer ranges impacted include 189,459 acres of winter range, 73,437 acres of winter concentration areas, 91,623 acres of sever winter range and 115,772 acres of summer range. Critical elk ranges crossed by the corridor include 182,647 acres of winter range, 59, 029 acres of winter concentration areas, 59,178 acres of sever winter range and 8,744 acres of production areas. Big horn sheep and pronghorn antelope are affected to a lesser extent with 1,347 and 39,812 acres of winter range, respectively.

Generally, the timing of disturbances, reclamation practices, widths, and long term use (i.e. timing, duration, type, and amount of ROW traffic) of these corridors will be critical in determining the impacts to big game. Construction and installation of utilities on these pipelines during the months of July through September would have the least amount of impacts to big game. Due to animal fidelity to winter ranges, big game winter ranges are irreplaceable and are habitats consistently occupied by animals during winter months therefore mitigation is very important. Disturbances within winter range can significantly impact the carrying capacities of these herds and have lasting, long term population level effects as to how these herds are managed. This is an extremely important consideration given the economic importance of big game animals to the state of Colorado.

Recommendations for corridor development in big game range include:

- Avoidance of surface disturbance to and construction activities on elk, mule deer or pronghorn antelope winter range from 1 January to 15 April.
- Avoidance of surface disturbance to and construction activities on bighorn sheep winter range from 1 November to 15 April.
- Avoidance of surface disturbance to and construction activities on elk and mule deer populations areas from 15 May to 15 June.
- NSO within Rocky Mountain Bighorn Sheep Production Areas.
- Identify critical vegetative cover types and adjust development sites to avoid these areas.

Aquatic Species. Habitats for several fish species of federal and state concern may be impacted by the proposed corridor. The species include the federally endangered and state threatened Colorado pikeminnow and humpback chub, the federally endangered and state endangered bonytail chub and the state species of special concern and BLM sensitive species Colorado River cutthroat trout, Colorado roundtail chub (*Gila robusta*), bluehead sucker (*Catostomus discobolus*) and flannelmouth sucker (*Castostomas latipinnis*). Federally listed critical habitats for many of the species have been designated. The State of Colorado has invested heavily to ensure the suitability of river habitat for these aquatic species. The CDOW is concerned about cumulative impacts to these resources and how this may affect our ability to make significant progress in the recovery and eventual delisting of these species in Colorado. CDOW and BLM are signatories to the Rangewide Conservation Agreement for Roundtail Chub, Bluehead Sucker, and Flannelmouth sucker (Utah Department of Natural Resources, Division of Wildlife Resources. Publication Number 06-18, 2006). In addition, both agencies are also signatories to the Conservation Agreement for the Colorado River Cutthroat Trout in the States of Colorado, Utah, and Wyoming (CRCT Conservation Team 2006).

Recommendations for corridor development within critical fish habitat include:

- Collect and analyze water samples to monitor water quality before, during and after occupation and document data and changes.
- Design stream crossings to minimize the total number of crossings and so that crossings are at or as near to 90 degrees to the direction of stream flow.
- Construct stream crossings should be “in the dry”.
- Avoid impacts to trout during spawning and hatching periods.
- Restrict trucks from crossing streams and utilize appropriate and effective culverts during construction activities, which don't preclude upstream movement of fish.
- Avoid using low water crossings.
- Consult with CDOW to determine locations for bridges or culverts that permit fish passage at appropriate stream crossings.
- Control erosion and sedimentation, and manage storm water runoff; reclaim sites as quickly as possible to restore vegetation.
- Control weeds along riparian corridors and manage livestock access to stream crossings to maintain riparian corridor health.
- Consider fencing riparian areas.
- Avoid changes to water quality and quantity.
- Repair incised channels where excessive erosion and sedimentation is occurring.
- Consider directional boring of pipeline crossings of perennial streams.
- Replace non-native riparian vegetation such as tamarix and Russian olive with appropriate native plantings such as cottonwood or willow.

Wildlife Summary. In summary, the proposed project will affect numerous wildlife species across the state of Colorado. The DOW maps and tracks species occurrence and habitat use in Colorado for a number of species of interest. Of those species mapped, 27 are directly impacted by the proposed corridor on public lands (see Attachment 3). Many critical habitats, such as breeding areas, brood and calving areas, nest sites and important winter range are traversed by the proposed corridor. The geographical scale and extent of the project make it impossible to avoid sensitive habitats. It also makes it impossible to apply one recommended option to protect these important habitats. It is critical to work with local agency personnel during the planning phase and to put effort forth to avoid impacting species of greatest concern. The wildlife of Colorado is experiencing habitat impacts at an unprecedented rate, with increased human development, recreational opportunities and energy development.

General recommendations for corridor development in wildlife habitat include:

- Reclaim corridors with native seed mixes and establishing a monitoring protocol to determine the success of such reclamation and assess noxious weed invasions is critical.
- Minimize corridor width to maximum extent possible to reduce the impacts to wildlife populations and their habitats.
- Minimize the widths of these corridors to expedite the reestablishment of native populations and their habitats.
- Restrict, minimize, and limit seasonal use of vehicle traffic along the ROW that will be needed or maintenance of the utilities in these corridors to lessen the impacts to wildlife.
- Limit repeated disturbances. Repeated disturbances can have a great and lasting effects on wildlife

behavior, habits and population carrying capacities.

- Conduct habitat assessments, prior to development and disturbances, to establish a baseline vegetation condition and inventory and to provide a basis for potential habitat improvement projects if applicable and as a basis for monitoring.

A **sixth** major CDOW item includes comments on Interagency Operating Procedures (IOPs).

Energy Corridor IOP and Mitigation Issues

- 1) CDOW feels that the IOPs and Mitigation Measures (MMs) contained in the document will not be sufficient to protect wildlife resources in Colorado unless they contain mandatory non-discretionary requirements, and include clear references to state specific recommended practices to protect wildlife resources. For energy development activities such as energy corridors, CDOW has developed the following non-discretionary seasonal timing restrictions and no surface occupancy buffer zones:

SEASONAL TIMING LIMITATIONS:

- Mule Deer Winter Range-no development activity between 1 January and 15 April.
- Elk Winter Range-no development activity between 1 January and 15 April.
- Pronghorn Antelope Winter Range- no development activity between 1 January and 15 April.
- Bighorn Sheep Winter Range-no development activity between 1 November and 15 April.
- Columbian sharp-tailed grouse, plains sharp-tailed grouse nesting habitat (areas within 1.25 miles of active lek sites)-no development activity between 1 March and 30 June.
- Elk Production Areas- no development activity between 15 May and 15 June.
- Greater prairie chicken nesting habitat (areas within 2.2 miles of active lek sites)-no development activity between 1 March and 30 June.
- Greater sage grouse and Gunnison sage-grouse nesting habitat (areas within 4 miles of active lek sites)-no development activity between 1 March and 30 June.
- Greater sage grouse, Gunnison sage-grouse, Columbian sharp-tailed grouse, plains sharp-tailed grouse, greater prairie chicken and lesser prairie chicken winter habitat- no development activity between 1 December and 15 March.
- Kit Fox Den Sites-no construction activity within ¼ mile of den sites between 1 February and 1 May.
- Lesser Prairie Chicken nesting habitat (areas within 2.2 miles of active lek sites)- no development activity between 15 March and 15 July.
- Swift Fox Den Sites-no construction activity within ¼ mile of den sites between 15 March and 15 June.
- Prairie Dog (black-tailed, white-tailed, Gunnison's)- no development activity between 1 March and 1 July in Prairie Dog colonies where Black-footed ferrets have been released or documented since 2001.
- Raptors (variable by species-defined in Craig 2001)- no development activity within nest buffers or roost sites during the defined nesting or roosting dates.
 - Bald Eagle Nest Sites-no developmental activity within ½ mile of active Bald Eagle Nest Sites between 15 November and 31 July.
 - Bald Eagle Winter Roost Sites- no developmental activity within ½ mile of active Bald Eagle Winter Roost Sites between 15 November and 15 March except for periodic visits such as oil maintenance and monitoring work within the buffer zone after development which should be restricted to the period between 10:00am and 2:00pm.
 - Bald Eagle Winter Concentration Areas-no human disturbance within any mapped winter concentrations areas between November 15 and March 15.
 - Ferruginous Hawk Nest Sites and Alternate Nest Sites-no human disturbance within ½ mile of Ferruginous Hawk Nest Sites or Alternate Nest Sites between February 1 and July 15.
 - Golden Eagle Nest Sites-no development within ¼ mile of active Golden Eagle Nest Sites between 15 December and 15 July.
 - Mexican Spotted Owls-no development activity within and adjacent to Mexican Spotted Owl Protected Activity Centers (PAC's) between 1 March and 31 August.
 - Osprey Nest Sites-no development activity within ¼ mile of active Osprey Nest Sites Between 15 December and 15 July.
 - Peregrine Falcon Nest Sites-no development activity within ½ mile of active Peregrine Falcon Nest Sites between 15 March and 31 July.

- Least Tern Foraging Areas-no development activity within ½ mile at known least tern protection areas.
- Piping Plover Foraging Areas-no development activity within ½ mile of known Piping Plover production areas.

NO SURFACE OCCUPANCY (NSO) AREAS:

- Areas within Rocky Mountain Bighorn Sheep Production Areas
- Areas Within Desert Bighorn Sheep Production Areas
- Areas within Mountain Goat Production Areas
- Areas within 0.6 miles of any greater sage-grouse, Gunnison sage-grouse, greater prairie chicken and lesser prairie chicken leks (strutting grounds)
- Areas within 0.4 miles of any Columbian sharp-tailed grouse or plains sharp-tailed grouse leks (strutting grounds)
- Areas within Prairie Dog colonies with documented Black-footed Ferret sightings
- Areas within USFWS designated critical habitat for Preble’s Meadow Jumping Mouse
- Areas within Lynx breeding habitat
- Areas within 300 feet of high water mark of mapped Least Tern nesting habitat
- Areas within 300 feet of high water mark of mapped Piping Plover nesting habitat
- Areas within ¼ mile of active, inactive or historic Bald Eagle nest sites
- Areas within ¼ mile of active of active Bald Eagle winter roost sites
- Areas within ¼ mile of active Ferruginous Hawk nests or alternate nest sites
- Areas within ¼ mile of active, inactive or historic Golden Eagle nest sites
- Areas within designated Mexican Spotted Owl Protected Activity Centers (PAC’s_
- Areas within ¼ mile of active, inactive or historic Osprey nest sites
- Areas within ½ mile of active, inactive or historic Peregrine Falcon nest sites
- Areas within 200 feet of Southwest Willow Flycatcher nest sites and within 300 feet of potential Southwest Willow Flycatcher habitat
- Areas within ¼ mile of Townsend’s Big Eared Bat, Fringed Myotis, and Mexican Free-Tailed Bat roost sites
- Areas within 300 feet of any water within a Designated Cutthroat Trout Habitat area
- Areas within aquatic buffers defined in the species prioritization document (variable from 300 feet to 900 feet depending on stream classification)
- Areas within ½ mile of standing water bodies
- Areas with ½ mile of identified Northern Leopard Frog and Boreal Toad breeding sites

Please include the above referenced seasonal timing restrictions and no surface occupancy buffer ones as mandatory IOPs and/or mitigation measures for all phases of energy corridor development activities in Colorado. To facilitate this, please replace the 6th bullet on p.3-231 with the following:

“ROW development, construction, operation and maintenance activities will be subject to state and locally established wildlife and/or habitat protection provisions. Exceptions or modifications to spatial buffers or timing limitations established by state and local agencies will be evaluated on a site-specific basis within concurrence from the federal administrator and state and local wildlife agencies.”

This mitigation measure should appear as an IOP and be repeated in the preconstruction, construction, operation and maintenance phases for wildlife mitigation. Note that where an existing BLM Resource Management Plan contains a more restrictive seasonal timing limitation or no surface occupancy standard for one of the resources identified. CDOW will defer to the local BLM office recommendation and the more restrictive standard.

- 2) The majority of the IOPs and MMS are currently worded in such a way that they are optional. Whether or not they would apply to a particular project during implementation appears to be up to the applicant or action agency for that particular project. For example, IOP No.2 Section 2.4.3 (p. 2-33), states that “Project staff should avoid harassment or disturbance of wildlife, especially during reproductive courtship, migratory, and nesting seasons.” This statement is not protective of wildlife resources because it is optional. CDOW recommends replacing this statement with a commitment that the applicant will avoid harassment and disturbance of wildlife by following the avoidance recommendations of applicable state wildlife agencies.

- 3) CDOW recommends that all IOPS and MMs regarding wildlife resources, wildlife habitats, reclamation, noxious weed control, stream crossings, and water resources be modified to remove discretionary language such as “could,” “would,” and “should.” Discretionary language in the IOPs and MMs should be replaced with non discretionary language such as “will” or “must.” Without the removal of discretionary language in the IOPs and MMs the proposed action will not ensure adequate protection of wildlife resources and habitats as individual project are implemented in the contemplated energy corridors in Colorado.
- 4) The following SOPs and MMS are critical to protecting wildlife resource in Colorado. CDOW recommends that the optional requirements in these SOPs and MMs should be mandatory for all projects implemented in the contemplated energy corridors in Colorado:
 - a. Section 2.4.1, IOP 9,11, 12, 13, 16
 - b. Section 2.4.2, IOP 1, 3, 6, 8
 - c. Section 2.4.3, IOP 1, 2, 3, 4, 5, 6, 7, 8, 9, 10
 - d. Section 3.8.4.2. Mitigation Measures. All bullets on pages 3-221 through 3-235
- 5) CDOW recommends including the following MMs as a modification and replacement of the MMS that they Cross reference:
 - a. Directional boring will be used to place pipelines at river and stream crossings whenever possible to reduce surface disturbance and the need for construction activities in riparian habitat. Low water fords and/or trenching at stream and river crossing will be used only as a last resort, and if used, will be constructed at the driest time of the year. If low-water fords and/or trenching is used, the pre-existing stream channel, including bed and banks, will be restored to pre-existing stream channel, including bed and banks, will be restored to pre-existing conditions (replaces second bullet right hand column p. 3-223; last bullet and third to last bullet P. 3-227).
 - b. Any pipelines crossing streams or rivers will have remotely actuated block or check valves on both sides of the stream or river. In addition, pipelines will be double-walled pipe at river crossings and include spill/leak detection and a spill/leak contingency plan that includes timely notification to the appropriate state wildlife agency and local USFWS ecological service office (replaces second to last bullet P. 3-227; last bullet p. 3-235).
 - c. During pre-construction planning. Project proponents will identify important. Sensitive, or unique habitat and biota in the vicinity of a proposed project in consultation with state and local wildlife agencies. Once these resources are identified, project proponents will design the project to avoid potential impacts if possible. Where impact avoidance is not possible based on the best available technology, project proponents will plan to minimize and mitigate the anticipated impacts to these reprices per guidance from appropriate federal agencies, and state and local wildlife agencies. Off-site compensatory mitigation may be considered as a last resort in concurrence with state and local wildlife agencies (replaces second and las bullet, right hand column p. 3-228; first full bullet p. 3-229).
 - d. Refueling services for construction, operation, and maintenance will be located a minimum of 500 feet from wetlands, rivers, streams, springs, seeps, riparian areas, lakes, ponds, drainages, and other receiving waters. The location of refueling areas will be designated for each phase of construction, operation, and maintenance for all classes of equipment and service vehicles. Refueling locations will be designated to include impermeable secondary containment for accidental releases regardless of the applicability of SPCC regulations (replaces third bullet p. 3-227).
 - e. Sanitation services will be provided for construction, operation, and maintenance of facilities in the energy corridors. The location of sanitation services will be designated for each phase of construction, operation, and maintenance and will comply with specified 500 foot buffer requirement for wetlands, rivers, streams, springs, seeps, riparian areas, lakes, ponds, drainages, and other receiving waters.

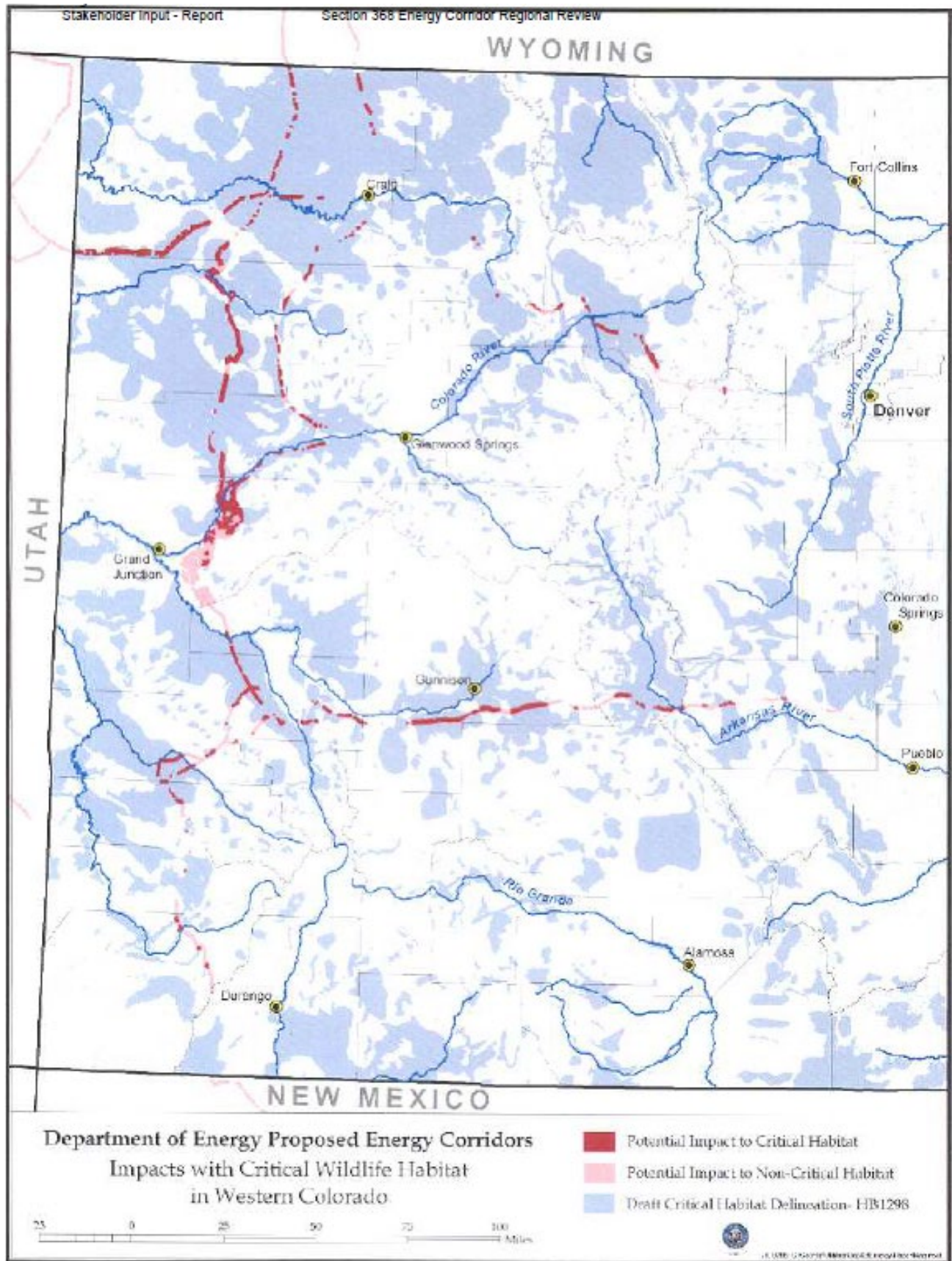
Thank you for the opportunity to comment on this very important west wide energy Corridors designation PEIS.

Sincerely,

Thomas E. Remington
Director

Cc: R. Velarde
T. Speeze

J. Holst
K. Kaal
B. Petch
J. Broderick
S. Hebein
M. Cowardin



CRITICAL HABITAT POTENTIALLY IMPACTED BY ENERGY CORRIDORS

Consultation Species and Seasonal Activity Areas

(CDOW will consult on oil and gas development occurring in any individual or combination of the species or seasonal activity areas listed below.)

HIGH PRIORITY HABITAT ECONOMIC SPECIES AND SPECIES AT RISK (RARE, THREATENED AND ENDANGERED) WEIGHTING FACTORS, REVISED January 29 th , 2008					
SPECIES	ACTIVITY AREA AND DEFINITION	IMPACT FACTOR	STATUS FACTOR	TOTAL	FINAL RANKING
Bald Eagle	Active Nest Site A specific location in which a pair of bald eagles have at least attempted to nest within the last five years. Any nest location that can be directly tied to courtship, breeding, or brooding behavior is considered active. A buffer zone extends .5 miles around a known active nest.	5	4	9	Very High
	Roost Site Groups of or individual trees that provide diurnal and/or nocturnal perches for less than 15 wintering bald eagles. Includes a buffer zone extending 1/4 mile around these sites. These trees are usually the tallest available trees in the wintering area and are primarily located in riparian habitats.	5	4	9	Very High
Bighorn Sheep	Production Area That part of the overall range of bighorn sheep occupied by pregnant females during a specific period of spring. This period is May 1 to June 30 for Rocky Mountain bighorn sheep and February 28 to May 1 for desert bighorn sheep.	5	4	9	Very High
	Severe Winter Range That part of the overall range where 90% of the individuals are located when the annual snow-pack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten.	5	4	9	Very High
	Winter Concentration Area That part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten.	5	4	9	Very High
Black-footed Ferret	Overall Range/Release Site Those areas defined by USFWS where Black-footed Ferrets have been released into the wild.	5	5	10	Very High
Columbian Sharp-tailed	Production Area An area that includes 90% of sharp-tailed grouse nesting and	5	4	9	Very High

Grouse	brood rearing habitat. This is mapped as a buffer zone of 1.25 miles around dancing grounds.				
Elk	Production Area That part of the overall range of elk occupied by the females from May 15 to June 15 for calving. (Only known areas are mapped and this does not include all production areas for the DAU).	5	4	9	Very High
	Migration Corridor A specific map-able site through which large numbers of animals migrate and loss of which would change migration routes.	5	4	9	Very High
Greater Sage Grouse	Lek Site Areas known to be used by sage-grouse within the last 10 years from the date of mapping. "Use" is defined as 1) radio telemetry locations, 2) confirmed observations of birds or sign by reliable sources 3) documented use reported in unpublished reports or publications. (mapped by field biologists). Buffered at 0.5 miles.	5	4	9	Very High
	Production Areas An area that would include the majority of important sage grouse nesting habitat. Mapped as a buffer zone of 4 miles around an active lek.	5	4	9	Very High
Gunnison Sage Grouse	Lek Sites Areas known to be used by sage-grouse within the last 10 years from the date of mapping. "Use" is defined as 1) radio telemetry locations, 2) confirmed observations of birds or sign by reliable sources 3) documented use reported in unpublished reports or publications. (mapped by field biologists). Buffered to 0.5 miles.	5	4	9	Very High
	Production Areas An area that would include the majority of important sage grouse nesting habitat. Mapped as a buffer zone of four miles around an active lek.	5	4	9	Very High
Mule Deer	Migration Corridor A specific mapable site through which large numbers of animals migrate and loss of which would change migration routes.	5	4	9	Very High
	Critical Winter Range Definition pending.	5	4	9	Very High
Pronghorn	Migration Corridor	5	4	9	Very High

Antelope	A specific mappable site through which large numbers of animals migrate and loss of which would change migration routes:				
Western Boreal Toad	Field Sighting (Buffered) All locations where a documented observation of any life stage of the boreal toad (toads, tadpoles, and/or eggs) has taken place. These locations are represented as point data and are buffered by 800ft for protection purposes.	5	4	9	Very High
Aquatic Habitats	Recovery/conservation waters Lakes and river reaches containing non-salmonid and native salmonid species currently under management for population conservation and recovery, buffered to 100m. Includes native cutthroats, endangered big-river species, eastern plains native fish (three-species (flannelmouth sucker, bluehead sucker, roundtail chub) and mountain sucker. Category 100, 101, 201, 202.	5	4	9	Very High

Non-Consultation Wildlife Species and Seasonal Activity Areas
(These species and seasonal activity areas do not trigger consultation on their own. However, CDOW reserves the right to make recommendations on these species and seasonal activity areas when consultation is triggered by another species or seasonal activity area or when consultation occurs pursuant to a requested waiver of any Standard Operating Practice.)

HIGH PRIORITY HABITAT ECONOMIC SPECIES AND SPECIES AT RISK (RARE, THREATENED AND ENDANGERED) WEIGHTING FACTORS, REVISED January 29 th , 2008					
SPECIES	ACTIVITY AREA AND DEFINITION	IMPACT FACTOR	STATUS FACTOR	TOTAL	FINAL RANKING
Bald Eagle	Inactive Nest Site A former active nest location in which neither courtship, breeding, or brooding activity has been observed at any time during the last 5 years. A buffer zone of .5 mile extends around an inactive nest.	4	4	8	High
	Nest of Unknown Status A nest that is inactive for at least 10 years and has not been checked.	3	4	7	High
	Winter Concentration Area Areas (tree islands, etc) within an existing winter range where eagles concentrate between November 15 and March 15. These areas may be associated with roost sites.	4	4	8	High

Bighorn Sheep	Overall Distribution The area which encompasses all known seasonal activity areas within the observed range of a bighorn sheep population.	2	4	6	Moderate
	Summer Concentration Area Those areas where bighorn sheep concentrate from mid-June through mid-August. High quality forage, security, and lack of disturbance may be characteristic of these areas to meet the high energy demands of lactation, lamb rearing, horn growth, and general preparation for the rigors of fall and winter.	4	4	8	High

Black Bear	Summer Concentration Area That portion of the overall range of the species where activity is greater than the surrounding overall range during that period from June 15 to August 15.	2	4	6	Moderate
	Fall Concentration Area That portion of the overall range occupied from August 15 until September 30 for the purpose of ingesting large quantities of mast and berries to establish fat reserves for the winter hibernation period.	4	4	8	High
	Movement Corridor A subjective indication of the general direction of black bear movement between seasonal use areas.	3	4	7	High

Black-tailed Prairie Dog	Active Colonies An area where a colony has become established and has been documented to be active within the past 10 years.	4	4	8	High
	Inactive Colonies An area where a colony has become established and has been documented to be inactive within the past 10 years.	2	4	6	Moderate

Brazilian Free-Tailed Bat, Townsend's Big-eared Bat, Fringed Myotis	Roosting Area A place occupied by Bats, including a 1/4 mile buffer, that provides shelter from the physical elements, and protection from predation. Roost sites for Brazilian Free-Tailed Bats typically are established in caves or abandoned mines, rock crevices, and buildings. There are two different types of roosts used by Brazilian Free-Tailed Bats, depending on the season of use, and activity that occurs at the roost. These different types of roosts are listed below. Day Roost: A roost occupied by males or non-reproductive females, during periods of torpor or inactivity, during the warm seasons. Maternity Roost: A roost occupied by pregnant or nursing bats, and young of the year, that can gather in large numbers during the late spring and summer seasons.	5	2	7	High
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Burrowing Owl	Potential Habitat Known PD colonies > 5 acres, restrictions between 3/1 and 8/15	5	3	8	High
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Columbian Sharp-tailed Grouse	Winter Range Observed winter range of sharp-tailed grouse usually in a tall shrub vegetative type (greater than or equal to 2 meters) within 3 miles of lek sites. Shrub height should allow feeding on buds by birds above normal snow depths.	3	4	7	High
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Elk	Winter Range That part of the overall range of a species where 90 percent of the individuals are located during the average five winters out of ten from the first heavy snowfall to spring green-up, or during a site specific period of winter as defined for each DAU.	2	4	6	Moderate
	Severe Winter Range That part of the range of a species where 90 percent of the individuals are located when the annual snow-pack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten. The winter of 1983-84 is a good example of a severe winter.	4	4	8	High
	Winter Concentration Area That part of the winter range of a species where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten.	4	4	8	High

Greater Sage Grouse	Winter Range Observed Winter Range	2	4	6	Moderate
	Severe Winter Range That part of the winter range where 90 percent of the individuals are located when annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten. The winters of 1983-84, or 96-97 are good examples.	3	4	7	High
	Core Range That range surrounding populations considered by the Terrestrial Section to be most important to population stability. Production areas with the highest population numbers were linked with large patch-size sagebrush habitat, and extended to include 80% of nesting habitat for at least 50% of a population	4	4	8	High

Greater Prairie Chicken	Lek Site An area where greater prairie chickens are known to have displayed and bred in the past 10 years. Current activity may be active, inactive or unknown. Lek sites typically, although not always, are located on open ridges, grass knolls, or slight rises in topography where vegetation is sparse. Buffered at 0.6 miles	8	4	8	High
	Production Area An area which includes all nesting and brood rearing habitat of the greater prairie chicken. Currently defined as a 2.2 mile buffer zone around each active lek	8	4	8	High
	Winter Range Areas where greater prairie chickens concentrate during the winter to feed on small grain crops	3	4	7	Moderate

Greater Sandhill Crane	Nesting Area Site locations where greater sandhill cranes were found to be nesting during field surveys.	4	3	7	High
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Gunnison's Prairie Dog	Active Colonies An area where a colony has become established and has been documented to be active within the past 10 years.	4	4	8	High
	Inactive Colonies An area where a colony has become established and has been documented to be inactive within the past 10 years.	2	4	6	Moderate
	Management Focus Area Draft areas developed for the in-progress conservation plan.	2	4	6	Moderate

Gunnison Sage Grouse	Winter Range Observed winter range	2	4	5	Moderate
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	Severe Winter Range That part of the winter range where 90 percent of the individuals are located when annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten. The winters of 1983-84, or 96-97 are good examples.	3	4	7	High
Kit Fox	Overall Range Areas known to be utilized by kit fox in Colorado.	2	4	6	Moderate
Lesser Prairie Chicken	Winter Range Areas where lesser prairie chickens concentrate during the winter to feed on small grain crops.	3	4	7	High
Lynx	Potential Range Areas having the highest potential of lynx occurrences in the state. These areas usually contain positive, probable, or possible reports.	3	5	8	High
	Occupied Range That part of the potential Range where populations of Lynx are known to exist. Distributions of Lynx are determined through tracking of radio-collar signals.	3	5	8	High
Massasauga	Overall Range Overall Range for Massasauga (<i>Sistrurus catenatus</i>) in Colorado. Overall Range is defined as an area that encompasses all known seasonal activity areas within the range of a population of Massasauga. Massasauga are typically associated with short-grass prairie habitats at elevations below 1,675m (5,500ft.) in southeastern and east-central Colorado.	3	3	6	Moderate
Moose	Summer Range That part of the overall range where 90% of the individuals are located during the summer months. This summer time frame will be delineated with specific start/end dates for each moose population within the state (ex: May 1 to Sept 15). Summer range is not necessarily exclusive of winter range.	2	4	6	Low
	Concentration Area That part of the range of a species where densities are 200% higher than the surrounding area during a specific season.	2	4	6	Moderate
	Priority Habitat Habitat types associated with the food and cover requirements of moose. Significant loss of these habitats would change moose distribution and/or would adversely affect the population. These habitat types include but are not limited to willow dominated riparian areas, sub-climax coniferous forest mixed with shrub lands, and dense climax coniferous forests.	3	4	7	High

Mountain Goat	Overall Range An area which encompasses all known seasonal activity areas within the observed range of a population of mountain goat.	2	4	6	Moderate
	Concentration Area That part of the overall range where densities are at least 200% greater than the surrounding area.	3	4	7	High
	Production Area That part of the home range of a species occupied by the females during a specific period of spring. This period is May 15 to June 30 for mountain goats.	4	4	8	High
Mountain Plover	Suitable Habitat Shortgrass w/ bare ground? See Vicki Nicole	4	3	7	High
Mule Deer	Winter Range That part of the overall range where 90 percent of the individuals are located during the average five winters out of ten from the first heavy snowfall to spring green-up, or during a site specific period of winter as defined for each DAI.	2	4	6	Moderate
	Severe Winter Range That part of the overall range where 90% of the individuals are located when the annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten.	4	4	8	High
	Winter Concentration Area That part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten.	5	4	8	High
Northern Leopard Frog	Field Sighting (Buffered) All locations where a documented observation of any life stage of the Northern Leopard Frog has taken place. These locations are represented as point data and are buffered by 200 meters for protection purposes.	5	3	8	High
Peregrine Falcon	Active Nest Site A site where peregrine falcons nested or attempted to nest within the previous 5 years. The nest site itself is identified by a point location on the map. A 1/4 mile buffer zone is drawn around this point and is intended to be a zone protected from disturbance or habitat alteration.	5	3	8	High
	Nesting Area An area which includes good nesting sites and contains one or more active or inactive nest locations. The boundaries are drawn based on professional judgment to include most known nesting habitat in the vicinity. Usually these areas are mapped as polygons around cliffs and include a 1/4 mile buffer surrounding the cliffs.	5	3	8	High
Plains Sharp-tailed Grouse	Lek Site Usually an open area or area of low vegetative cover, usually on a ridge or knoll where sharp-tailed grouse traditionally display and breed. Current activity may be active, inactive or	8	4	8	High

	unknown. Buffered at 0.4 miles.				
	Production Area An area that includes 90% of sharp-tailed grouse nesting and brood rearing habitat. This is mapped as a buffer zone of 1.25 miles around dancing grounds.	8	4	8	High
	Winter Range Observed winter range of sharp-tailed grouse usually in a tall shrub vegetative type (greater than or equal to 2 meters) within 3.0 miles of lek sites. Shrub height should allow feeding on buds by birds above normal snow depths.	3	4	7	High
Pronghorn Antelope	Winter Range That part of the overall range where 90 percent of the individuals are located during the average five winters out of ten from the first heavy snowfall to spring green-up, or during a site specific period of winter as defined for each DAI.	2	4	6	Moderate
	Severe Winter Range That part of the overall range where 90% of the individuals are located when the annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten.	4	4	8	High
	Winter Concentration Area That part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten.	4	4	8	High
Raptors	Active Nest Sites A site where raptors nested or attempted to nest within the previous 5 years. The nest site itself is identified by a point location on the map. A 1/2 mile buffer zone is drawn around this point and is intended to be a zone protected from disturbance or habitat alteration.	9	3	8	High
River Otter	Overall Distribution An area which encompasses all mapped seasonal activity areas within the observed range of a population of river otters.	4	4	8	High
	Concentration Area Areas where otters are known to concentrate. Otter sightings and signs of otter activity are higher in these areas than in overall range.	8	4	8	High
Swift Fox	Overall Distribution The area which encompasses the probable range of swift fox in Colorado. These areas are currently modeled utilizing the following criteria: areas on the East Slope of Colorado less than 7000 feet in elevation; associated with shortgrass, midgrass prairie, or sand sage/bluestem prairies occurring on less sandy/frable soils buffered two miles into adjacent land use types; and with fragmented habitats less than 4 square miles eliminated.	3	3	6	Moderate

<p>SW Willow Flycatcher</p>	<p>Potential Significant Habitat: Areas having the highest potential of southwestern willow flycatcher occurrences in the state. These habitats are currently modeled as follows: those areas on the west slope of Colorado; south of the Colorado River, and in the San Luis Valley that are less than or equal to 8500 feet in elevation and are within 300ft of a stream. These habitats include areas that have been surveyed for flycatchers as well as areas that have not been surveyed.</p> <p>NOTE: MANAGEMENT RECOMMENDATIONS: The SW willow flycatcher is a Federal Endangered Species and is under protection by the US Fish and Wildlife Service (USFWS) through Section 7 of the Endangered Species Act. Consultation with the USFWS needs to occur prior to federal project development. Avoidance of a site reported as containing flycatchers is recommended and may be required during the breeding season (April 30-August 15).</p>	2	5	7	High
<p>White-tailed Prairie Dog</p>	<p>Active Colonies An area where a colony has become established and has been documented to be active within the past 10 years.</p>	4	4	8	High
	<p>Inactive Colonies An area where a colony has become established and has been documented to be inactive within the past 10 years.</p>	2	4	6	Moderate
	<p>Management Focus Area Draft areas developed for the in progress conservation plan.</p>	2	4	6	Moderate
<p>White-tailed Ptarmigan</p>	<p>Overall Range Overall Range is defined as the probable range of White-tailed Ptarmigan in Colorado as determined from the following criteria: Areas greater than 10,800 feet in elevation, Colorado GAP vegetation types Mixed Tundra, Meadow Tundra, Prostrate Shrub Tundra, Bare Ground Tundra, Exposed Rock, Shrub Dominated Wetland/Riparian, and Graminoid/Forb Dominated Wetland.</p>	2	4	6	Moderate
	<p>Winter Range Winter Range is defined as an area utilized in winter most frequently where drainage basins at or above treeline and stream courses below treeline from 8,500 to 12,500ft elevation where food (willow) and roosting sites (soft snow) are readily available. Winter range is typically defined from late October thru mid-April.</p>	3	4	7	High
<p>Wild Turkey</p>	<p>Production Area Those area(s) that are used by turkeys for nesting during the period from March 15 to August 15. Human activity should be restricted in these areas during this period.</p>	4	4	8	High
	<p>Roosting Area Ponderosa pine and cottonwood trees of at least 10" dbh used by turkeys for diurnal and nocturnal perches.</p>	4	4	8	High
	<p>Winter Range That part of the overall range where 90% of the individuals are located from November 1 to April 1 during the average five winters out of ten.</p>	3	4	7	High
	<p>Winter Concentration Area</p>	4	4	8	High

	That part of the winter range where densities are at least 200% greater than the surrounding winter range density.				
Aquatic Habitats	Recreation waters Lakes and river reaches managed for cold-water and warm-water sport fishing. Category 501 - 507	5	2	7	High
	Non-managed waters Lakes and river reaches with mixed species or not managed. Category 500 - 700	4	2	6	Moderate
Wetlands	Wetland Habitat Delineation to be determined	4	4	8	High

STATUS FACTORS	
A weighting assigned to each species based upon the following criteria	
NUMERIC RANK	Status
5	Federal Threatened or Federal Endangered Species
4	State Endangered, State Threatened, State Species of Economic Importance
3	Federal Candidate/Petitioned or State Special Concern
2	Biological/Management Indicator Species or Sensitive Wildlife Species
1	All Other Species

IMPACT FACTORS

Impact Factor is a subjective ranking used by CDOW biologists to assess the relative sensitivity of species or seasonal activity areas to impact/disturbance by oil and gas activities. The ranking scale runs from 1 (low potential for impact) to 5 (high potential for impact). Sensitivity to impact includes a combination of species life history and behavior, including tolerance of disturbance; the relative abundance of seasonal habitat areas, including whether the habitats are fixed points or not; differential susceptibility to disturbance between seasons of the year; and other biological factors.

TOTAL FACTOR RANKING VALUES	
NUMERIC RANK	POTENTIAL FOR IMPACT
1-4	Low
5 - 6	Moderate
7-8	High
9-10	Very High

DIGITAL DATA DISCLAIMER:

This wildlife distribution map is a product and property of the Colorado Division of Wildlife, a division of the Colorado Department of Natural Resources. Care should be taken in interpreting these data. Written documents may accompany this map and should be referenced. The information portrayed on these maps should not replace field studies necessary for more localized planning efforts. The data are typically gathered at a scale of 1:24000 or 1:50000; discrepancies may become apparent at larger scales. The areas portrayed here are graphic representations of phenomena that are difficult to reduce to two dimensions. Animal distributions are fluid; animal populations and their habitats are dynamic.

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The map values are based on the following species, impact and status factors. Each Activity Area is defined as stated below.

SPECIES	MAPPED ACTIVITY	ACRES
Abert's Squirrel	Abert's Squirrel Overall Range	7,720
Bald Eagle	Bald Eagle Nest Sites	198
	Bald Eagle Roost Sites	2,333
	Bald Eagle Summer Forage	7,387
	Bald Eagle Winter Concentration	4,050
	Bald Eagle Winter Forage	34,761
	Bald Eagle Winter Range	106,871
Bighorn Sheep	Bighorn Sheep Summer Range	4,619
	Bighorn Sheep Winter Range	1,347
Black Bear	Black Bear Fall Concentration	13,572
	Black Bear Summer Concentration	16,269
	Black Bear Overall Range	212,019
Columbian Sharp-tailed Grouse	Columbian Sharp-tailed Grouse Production Area	316
	Columbian Sharp-tailed Grouse Winter Range	2,988
	Columbian Sharp-tailed Grouse Overall Range	5,919
Elk	Elk Migration Corridors	3,913
	Elk Production Area	8,744
	Elk Summer Concentration Area	2,519
	Elk Summer Range	71,544
	Elk Severe Winter Range	59,178
	Elk Winter Concentration Area	59,029
	Elk Winter Range	182,647
	Elk Overall Range	236,102
Great Blue Heron	Great Blue Heron Nesting Area	1,459
	Great Blue Heron Foraging Area	6,304
Geese	Geese Foraging Area	2,546
	Geese Production Area	4,580
	Geese Winter Range	7,502
Greater Sage-grouse	Greater Sage Grouse Brood Area	2,879
	Greater Sage Grouse Production Area	17,950
	Greater Sage Grouse Severe Winter Range	473
	Greater Sage Grouse Winter Range	27,162
	Greater Sage Grouse Overall Range	40,709
Gunnison's Prairie Dog	Gunnison's Prairie Dog Colonies	536
	Gunnison's Prairie Dog Overall Range	32,856
Gunnison Sage-grouse	Gunnison's Sage Grouse Brood Area	1,373
	Gunnison's Sage Grouse Production Area	15,482
	Gunnison's Sage Grouse Severe Winter Range	16,963
	Gunnison's Sage Grouse Winter Range	18,838
	Gunnison's Sage Grouse Overall Range	21,802
Kit Fox	Kit Fox Overall Range	14,318
Moose	Moose Concentration Area	1,835
	Moose Summer Range	14,289
	Moose Winter Range	1,844
	Moose Overall Range	15,298
Mt. Goat	Mountain Goat Overall Range	528
Mt. Lion	Mountain Lion Overall Range	261,988
Mule Deer	Mule Deer Concentration Area	2,146
	Mule Deer Migration Corridors	5,377

	Mule Deer Summer Range	115,772
	Mule Deer Severe Winter Range	91,623
	Mule Deer Winter Concentration Area	73,437
	Mule Deer Winter Range	189,459
	Mule Deer Overall Range	261,996
Osprey	Osprey Nest Sites	246
Peregrine Falcon	Peregrine Falcon Nesting Area	1,300
	Peregrine Falcon Potential Nesting	5,467
Pheasant	Ring-necked Pheasant Overall Range	656
Pronghorn	Pronghorn Antelope Migration Corridors	119
	Pronghorn Antelope Perennial Water	3,637
	Pronghorn Antelope Severe Winter Range	6,915
	Pronghorn Antelope Winter Concentration	8,124
	Pronghorn Antelope Winter Range	39,812
	Pronghorn Antelope Overall Range	76,665
Ptarmigan	White-tailed Ptarmigan Overall Range	572
River Otter	River Otter Overall Range	767
Scaled Quail	Scaled Quail Overall Range	849
Swift Fox	Swift Fox Overall Range	616
Turkey	Wild Turkey Overall Range	72,998
	Wild Turkey Production Area	8,895
	Wild Turkey Winter Range	22,014
White-tailed Deer	White-tailed Deer Overall Range	1,905
White-tailed Prairie Dog	White-tailed Prairie Dog Colonies	11,053
	White-tailed Prairie Dog Overall Range	68,188

Corridors PEIS Literary Citations

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COLORADO

Parks and Wildlife

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February 23, 2018

Mr. Jeremy Bluma
National Project Manager
Section 368 West-Wide Energy Corridors Regional Review Project
U.S. Bureau of Land Management
20 M Street, SE
Washington, DC 20003

RE: Section 368 West-Wide Energy Corridors Review

Dear Mr. Bluma-

Colorado Parks and Wildlife (CPW) appreciates the opportunity to provide information during the Section 368 West-Wide Energy Corridors Review conducted by the Bureau of Land Management (BLM), United States Forest Service (USFS) and Department of Energy. CPW provided extensive comments in 2008 on the Programmatic Environmental Impact Statement regarding the necessary avoidance, minimization, and mitigation measures for wildlife habitats and species in Colorado that could potentially be affected by corridor development. It is our understanding that this review is not a NEPA process and that development with a designated corridor would require site-specific NEPA analysis. Further, we understand that the purpose of the West-Wide Energy Corridors Review is to identify issues that could be taken into account during future land use planning efforts for BLM and USFS, and that CPW would have the opportunity to be involved in any future corridor development proposals.

CPW has been involved in a number of past and current land use planning efforts throughout Colorado. We have provided comments and input regarding resource conflicts (ROW avoidance/exclusion areas) and/or potential future use land management prescriptions within federal land management planning process. The comments below reiterate some of our previous and existing comments on land management planning efforts to date.

Greater Sage-Grouse (GRSG)

The Northwest Colorado Greater Sage-grouse Approved Resource Management Plan Amendment (dated September 2015) designates GRSG Priority Habitat Management Areas (PHMA) and General Habitat Management Areas (GHMA) as Right Of Way (ROW) Avoidance Areas. We support these existing designations. Portions of Corridors 73-133, 126-133, 133-142, 138-143, 132-133, and 144-275 fall within PHMA or GHMA and many of them go directly through or adjacent to known active GRSG leks, nesting, and production areas. We recommend that these identified corridors be rerouted to avoid PHMA and GHMA. In areas where existing overhead transmission lines are present we recommend the disturbance for a designated corridors be within the pre-existing infrastructure footprint • allowing for upgraded capacity of existing infrastructure without expansion of corridor ROW within these habitat types. If avoidance or co-location is not possible we recommend burying the transmission line and instituting compensatory mitigation to offset the habitat fragmentation and loss to GRSG.

Gunnison Sage-Grouse (GUSG)

Gunnison Sage-grouse have been listed by the US Fish and Wildlife Service (USFWS) as a 'Threatened Species' under the Endangered Species Act. The West-Wide Energy Corridor document was completed prior to GUSG listing. Corridors 132-277, 139-277, 130-274 pass through areas mapped by the USFWS as Critical Habitat essential for the conservation of Gunnison Sage-grouse.

CPW is a Cooperating Agency for the ongoing the Range-wide Gunnison Sage-grouse RMP Amendment process. Throughout the planning process we have recommended that GUSG Critical Habitat within the satellite populations (Crawford, Cerro Summit-Cimarron-Sims Mesa, Dove Creek, Dry Creek Basin, Miramonte, Poncha Pass and Pinon Mesa) be designated as a ROW Exclusion Area and in the Gunnison Basin, Critical Habitat be designated a ROW Avoidance Area. We recommend that these identified corridors be rerouted to avoid GUSG habitat, particularly corridors 130-274 and 132-277 in GUSG satellite populations. In areas where existing overhead transmission lines are present we recommend the disturbance for a designated corridors be within the pre-existing infrastructure foot print - allowing for upgraded capacity of existing infrastructure without expansion of corridor ROW within these habitat types. If avoidance or co-location is not possible within the Gunnison Basin, then we recommend burying the transmission line and instituting compensatory mitigation to offset the habitat fragmentation and loss to within the Gunnison Basin. Additionally, CPW recommends that the BLM and USFS consult with the USFWS to ensure compliance with the Endangered Species Act.

Columbian Sharp-tailed Grouse (CSTG)

Portions of corridor 144-275 go directly through or adjacent to known active Columbian sharp-tailed grouse (CSTG) leks, nesting, and production areas. We recommend that these identified corridors be rerouted to avoid these habitats. In areas where existing overhead transmission lines are present we recommend the disturbance for a designated corridor be located within the pre-existing infrastructure foot print - allowing for upgraded capacity of existing infrastructure without expansion of corridor ROW within these habitat types. If avoidance or co-location is not possible, then we recommend burying the transmission line and establish compensatory mitigation to offset the habitat fragmentation and loss to CSTG.

Conservation Easements and CPW Properties

Corridors 13-274, 139-277, 136-277, 132-276, 132-136, 132-133, 144-275, 47-52, 138-143, 126-133, 73-133, 87-277 and 126-133 cross private lands encumbered by conservation easements or CPW-owned properties. CPW owned properties are managed for wildlife, wildlife related recreation, and other recreational uses. In many instances corridor development would be incompatible with the purpose for which those properties were acquired and are managed. We recommend avoiding CPW properties for corridor alignments. If avoidance is not possible we will require close pre-planning and coordination with our staff.

The corridors identified above also cross many private land parcels that are encumbered by conservation easements. CPW, Great Outdoors Colorado, private land owners, local and national land trusts, and the citizens of Colorado have made significant financial investments in private land conservation for public benefit. While each individual property has specific allowable and prohibited uses, corridor development in most cases could be incompatible and detrimental to the conservation values for which those parcels have been conserved. We recommend that the Corridor Review take into account private land conservation and avoid those parcels that have been conserved in perpetuity. In instances where an easement prohibits corridor development and avoidance of the parcel is not possible, and the exercise of Eminent Domain may result, then the lost conservation values due to corridor development must be compensated for and replaced.

Black Footed Ferrets

The eastern portion of Corridor 87-227 has prairie dog colonies that may support black-footed ferrets (*Mustela nigripes*), a Federal and State of Colorado 'Endangered Species'. Re-introduction sites for this species are located in black-tailed prairie dog colonies just east of the start of corridor 87-227. CPW recommends consultation with USFWS for any work that might impact black-tailed prairie dog

colonies in this area and potentially black-footed ferrets, particularly if the right of way intrudes onto a property currently enrolled under a USFWS Programmatic Safe Harbor Agreement or the NRCS Black-footed Ferret Special Effort Conservation Program.

Raptors

Numerous raptor species nest and forage in the vicinity of the corridor alignments. Protecting existing raptor nest sites and the reproductive activities at those sites is critical for managing long-term raptor population trends in Colorado. If any of these corridors are to be developed we recommend instituting raptor nest surveys and avoiding nest sites per our recommendations outlined in our 2008 letter.

Species of Interest

The corridor alignments intersect and bisect a number important habitats and migration routes for species of interest throughout Colorado. The habitats include mapped production areas for elk and bighorn sheep, critical winter ranges for deer and elk, boreal toad breeding sites, lynx habitat, and cutthroat trout streams. We anticipate that the application of best management practices to avoid, minimize, and mitigate development impacts to these species could be dealt with at the project specific level should a corridor be proposed for development.

Thank you for the opportunity to comment on the West-Wide Energy Corridor Review. If you have additional questions or would like to discuss our recommendations please contact Southwest Land Use Coordinator, Brian Magee at (970) 375-6707.

Sincerely,



Bob Broscheid
Director

xc: JT Romatzke, NW Region Manager
Mark Leslie, NE Region Manager
Dan Prenzlów, SE Region Manager
Patt Dorsey, SW Region Manager
Jon Holst, SW REL
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4 June 2014

Gina Jones
Bureau of Land Management
Southwest District Office
2465 South Townsend Avenue
Montrose, CO 81401

Re: Tri-State Transmission Line Rebuild, Montrose-Nucla-Cahone Environmental Assessment
(SWD NEPA 13-01)

Dear Ms. Jones,

Colorado Parks and Wildlife (CPW) has received a scoping notice for the Tri-State Transmission Line Rebuild, Montrose-Nucla-Cahone Environmental Assessment (EA). The Proposed Action includes an upgrade of the existing transmission line system across private, state, and federal lands in southwestern Colorado. Tri-State is proposing to upgrade and rebuild the existing Montrose-Nucla-Cahone transmission line from 115 kilovolts (kV) to 230 kV. In most instances, the existing 125 mile transmission corridor would be used, but it would be expanded by 50 feet in width for its entire length. The surface disturbance from the corridor expansion is approximately 815 acres. The proposed project would include a new corridor crossing of the Dolores River Canyon. Two substations would be upgraded (Cahone and Montrose) requiring new disturbance, and there would be an entirely new substation built at an unspecified location somewhere near Nucla.

Please consider the following issues and concerns as BLM prepares the EA for this project:

Habitat Fragmentation and Weeds

CPW would like to emphasize the importance of limiting surface-disturbing activities to the maximum extent practicable by utilizing previously disturbed corridors and facilities where possible. This practice will help to minimize direct habitat loss and reduce the additional functional habitat loss that occurs with the introduction of invasive weed species in areas of new surface disturbance. In addition, we suggest using a reclamation seed mix that avoids aggressive non-native grasses and forbs in order to promote the reestablishment of native grasses, forbs, and shrubs relied upon by wildlife. We recommend the BLM and project proponent select appropriate native seed varieties, preferred by wildlife, matched to specific ecological site conditions.

The control of non-native, undesirable vegetation and noxious weeds is a challenge with large-scale surface-disturbing activities like the Proposed Action. Reducing the impact of weeds requires a vigilant, long-term, multiple season control effort that includes conducting pre-disturbance weed surveys along the transmission corridor. To reduce potential negative impacts from establishment of weeds, we also recommend: limiting the number of vehicles associated with the construction component of this project, washing vehicles prior to use in the area to

STATE OF COLORADO
John W. Hickenlooper, Governor • Mike King, Executive Director, Department of Natural Resources
Bob D. Broscheid, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: Robert W. Bray • Chris Castilian, Secretary • Jeanne Home
Bill Kane, Chair • Gaspar Perricone • James Pribyl • John Singletary

prevent weed seed spread, and utilizing certified weed-free seed and straw. We suggest monitoring weed management activities and reclamation success on at least an annual basis.

Big Game Concerns

The project area includes many habitat types for a wide variety of species located in southwest Colorado, including mule deer and elk. Due in large part to big game populations, Dolores, Montrose and San Miguel counties received combined economic benefits of approximately \$49.1 million in 2007 from hunting and fishing activities that support an estimated 571 jobs (BBC Research and Consulting 2008). These economic benefits from hunting and fishing recreational activities are a sustainable annual source of economic benefit for Dolores, Montrose, and San Miguel counties only if wildlife populations, and particularly big game populations, are maintained and quality hunting opportunities continue to exist.

Many higher elevation habitats along the Propose Action corridor are mapped as production areas for elk, while the lower elevations are used during the winter when snow accumulates at higher elevations. Much of the corridor sees very high deer and elk densities during winter months due to an influx of migratory animals. Mule deer and elk typically display high site fidelity to winter range, preferring to use the same areas year-after-year. CPW has mapped the portions of the corridor as a winter concentration areas for elk and severe winter range for both elk and mule deer. Winter habitats and migratory corridors are known to be a limiting factor on big game populations in western Colorado and other high mountain areas of the western United States (Sawyer et al. 2009, Bishop et al. 2009, Bartman et al. 1992).

Winter habitats for big game provide essential forage and thermal cover to help mule deer and elk minimize energy expenditure. Mule deer and elk are in a nutritional negative energy balance during the winter months, making energy conservation critical for calf and fawn survival and adult female reproductive fitness. Recent studies show that mule deer and elk avoid construction activities and may shift their distribution on winter range to sub-optimal habitats in response to development activities (Hebblewhite 2008, Sawyer 2009). Thus, disturbance to big game in the winter can lead to poor body condition, effect over winter survival of adults, and result in a decrease neo-natal survival rates (Ciuti et al 2012). These impacts can negatively affect big game populations and, ultimately, recreational hunting opportunities in the area.

CPW is concerned about disturbance from construction activities in winter and displacement of big game to sub-optimal habitats, as well as potential increases in agricultural game damage on private lands resulting from the displacement of big game from typical wintering areas. In order to minimize these impacts and avoid displacement of wintering big game, CPW recommends conducting construction activities within big game winter ranges outside the time period from December 1 through April 15. In addition, we are concerned about the potential short-term impacts to hunting recreation in areas adjacent to the Proposed Action corridor. We suggest if possible, avoiding construction during the big game hunting seasons.

Riparian and Aquatic Concerns

The San Miguel River, Naturita Creek, Disappointment Creek, the Dolores River, and numerous smaller perennial and intermittent streams are located and/or crossed by the existing alignment. Many fish species including: cutthroat, rainbow, and brown trout, bluehead sucker, flannelmouth sucker and roundtail chub inhabit many of rivers and streams within the project corridor. Riparian

and wetland habitat found along the perennial and intermittent streams within the proposed corridors also provide valuable habitat for a variety of terrestrial and avian wildlife species, including otter, beaver, coyote, bobcat and a variety of raptors, passerine birds and small mammals.

CPW's primary concern regarding aquatic species is to reduce erosion and sedimentation to streams by minimizing stream crossings and surface disturbing construction activities near these resources. Due to the significance of the riparian habitats, wetlands, and aquatic resources, CPW recommends a 300-foot no disturbance construction buffer on each side of perennial and intermittent streams. CPW also advises using existing road crossings and existing stream crossings for vehicles and other construction equipment instead of building new roads and stream crossings that will increase sedimentation and erosion.

Construction activities in and around wetland areas can result in direct habitat loss and impact the ecological functions. The CPW recommends:

- Surveying wetlands prior to any staging or ground disturbing activities.
- Planning maintenance actions to avoid low water crossings of all waterways and wetland habitats.
- Constructing proposed culvert or bridge installations during dry periods to minimize erosion and sedimentation. (These structures should be designed, constructed and installed in a manner that does not limit fish or river otter passage).
- Providing migration corridors to provide passage for amphibians and reptiles by constructing culverts or crossings under heavily used roads.
- Promptly revegetating all surface disturbances with locally-adapted, native plant species preferred by wildlife.

Migratory Birds and Raptors

Numerous raptor species likely forage in the vicinity of the transmission line alignments. There is an established body of evidence that human activities and habitat alteration in close proximity to raptor nest sites may adversely impact nest success (Oxley et al. 1974, Scott 1985, White and Thurow 1985, Knight and Skagen 1988, Watson and Langslow 1989, Holmes et al. 1993, Schomburg 2003, Fuller 2010). Many raptor species return to the same nest locations year-after-year, making their annual breeding success sensitive to direct and inadvertent human disturbance and habitat alteration at existing nest sites (Megown et al. 2007). Protecting existing raptor nest sites and the reproductive activities at those sites is critical for managing long-term raptor population trends in Colorado.

CPW has records of a several golden eagle nests with close proximity of the proposed alignment. There may be other raptor nests that CPW does not have documented along the transmission line routes. Therefore, we recommend conducting raptor nest surveys prior to the commencement of construction activities and avoiding those locations until raptors have fledged chicks and seasonally abandoned their nests and nearby roosts.

There is a large influx of migratory bald eagles into southwest Colorado during the winter months. We have documented numerous bald eagle winter concentration areas and roost sites along all major river and creeks within the project corridor. Bald eagle winter movements are

highly variable as they are influenced by changes in weather and prey availability. Therefore bald eagle distribution and abundance may change quickly during the winter and between winters.

The CPW recommends that no human encroachment occur from November 15 through March 15 within ¼ mile radius of an active winter night roost if there is no direct line of sight between the roost and the encroachment activities. No human encroachment from November 15 through March 15 within ½ mile radius of an active winter night roost if there is a direct line of sight between the roost and the encroachment activities. If periodic visits are required within the buffer zone after construction activities are completed, activity should be restricted to the period between 1000 and 1400 hours from November 15 to March 15.

Raptors will use the newly installed transmission line and poles for perching and building nests. Transmission lines pose both an electrocution and collision hazard for raptors. CDOW suggests that Tri-State utilize the Avian Power Line Interaction Committee (APLIC) suggested practices for avian protection on power lines and consider designs that minimize the risk of raptor electrocutions and collisions (APLIC 2006).

We are enclosing the CPW's Raptor Buffer Guidelines to assist the project proponents and permitting agencies for this project. The CPW developed these raptor guidelines to proactively address violations of the Federal Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA). CPW's recommendations do not serve as a release of liability from compliance with Federal law. We recommend contacting the U.S. Fish and Wildlife Service for additional information.

Gunnison Sage Grouse

Gunnison sage grouse (GuSG) are a Species of Concern for CPW, and a proposed Endangered Species under the Federal Endangered Species Act (16 U.S.C. 1531-1534). There are only a few remnant populations outside of the Gunnison Basin. The Dry Creek Basin population segment of GuSG has declined over the last several decades from at least three known active leks to only one known active lek. The Triangle lek, now classified as inactive, is approximately 0.6 mile from the existing transmission line and between Highway 141 and the line. The only known active lek in Dry Creek Basin is within approximately 4 miles of the existing transmission line.

Due to concerns that GuSG would be extirpated from the area, CPW augmented the population with transplants from the Gunnison Basin starting in 2006. A total of 62 individual GuSG have been transplanted into Dry Creek Basin to date. Studies using radio-marked GuSG indicated distance from the lek of capture to nests of radio marked hen GuSG ranged from 0.1 to 12.6 miles (RCP 2005).

The existing power line passes over mapped production areas for GuSG and is used as nesting/brood rearing area. The Gunnison Sage Grouse Rangewide Conservation Plan (RCP 2005) lists transmission lines and habitat fragmentation as threats to GuSG conservation. Transmission lines potentially increase raptor and corvid predation on sage grouse, and are a collision hazard for sage-grouse (RCP 2005). For these reasons, CPW has been concerned with the existing transmission line corridor through the Dry Creek Basin GuSG population for years.

In order to minimize potential impacts to GuSG, CPW recommends that the transmission lines be converted from overhead lines to underground lines in occupied grouse habitat in Dry Creek

Basin. In addition, we recommend the lines be relocated and placed in the shoulder of Highway 141 in this area to minimize habitat fragmentation, additional surface disturbance, and the potential for disturbance from future maintenance activities. To avoid disturbance to grouse during the lekking, nesting and brood rearing seasons, we also recommend that construction activities not occur from March 1-June 30.

In addition to the above-referenced avoidance and minimization measures, CPW recommends compensatory mitigation in the form of replacement of mapped occupied GuSG habitat that will be disturbed during construction. Habitat offsets should focus on replacing the impacted seasonal habitat type (through conservation of similar habitats) or improving adjacent habitats to the extent necessary to maintain Gunnison sage grouse population persistence in Dry Creek Basin.

In January of 2013, the USFWS proposed to list the Gunnison sage-grouse as endangered under the Endangered Species Act. The listing proposal includes maps identifying “critical habitat” essential to the conservation of the species. The corridor also passes through areas mapped by the USFWS as critical habitat for Gunnison sage-grouse. CPW recommends that the BLM and the Tri-state consult with the USFWS to ensure compliance with the Endangered Species Act.

Dolores River Canyon Crossing

CPW is concerned with the proposed deviation of the corridor alignment at the Dolores River crossing. The new proposed crossing area is one of the last unfragmented areas along the Dolores River Canyon within the area known as the East Pines. The East Pines contains some of the largest concentration of the wintering elk in all of southwest Colorado. We are concerned that the new proposed crossing would negatively impact this extremely important wintering and seclusion area for elk by removing 150 feet of timber and vegetation in an entirely new corridor, substantially increasing the overall surface disturbance of the project.

Conclusion

We appreciate the opportunity to comment on this project during the planning phase. If you have questions or would like to discuss the recommendations that we have provided, please contact Jon Holst at (970) 759-9588. We look forward to working with you to benefit wildlife.

Sincerely,

Jon Holst for

Patt Dorsey
Southwest Regional Manager, Durango

xc: Jon Holst, SW Region Energy Liaison; Matt Thorpe Area wildlife Manager, Durango, Renzo Delpiccolo Area Wildlife Manager, Montrose, Scott Wait, SW Region Senior Terrestrial Biologist; John Alves, SW Region Senior Aquatic Biologist; Brian Magee SW Region Land Use Coordinator, Area 15 and 18 File

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COLORADO

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September 23, 2019

Mr. Jeremy Bluma
National Project Manager
Sec. 368 Energy Corridor Regional Review Project
Bureau of Land Management
20 M Street, SE,
Washington, DC 20003

RE: Energy Policy Act Section 368 West-Wide Energy Corridors Region 2 and 3 Report
(August 2019)

Dear Mr. Bluma:

Colorado Parks and Wildlife appreciates the opportunity to provide feedback on the Region 2 and 3 Report (August 2019) for the Section 368 West-Wide Energy Corridors Review conducted by the BLM, USFS and Department of Energy (DOE). CPW has a history of providing input on this project. In 2008, CPW provided comments on the Programmatic Environmental Impact Statement, outlining avoidance, minimization and mitigation measures for wildlife habitats and species in Colorado potentially impacted by corridor development (Attachment 1). In 2018, CPW provided additional route-by-route comments on your earlier release of the Region 2 and 3 Report (Attachment 2). We do not reiterate those comments here, but the concerns expressed therein remain. It is our understanding that development within a designated corridor will require site-specific NEPA analysis, and that the purpose of the Section 368 West-Wide Energy Corridors Review is to identify issues for future land use planning efforts by BLM and USFS.

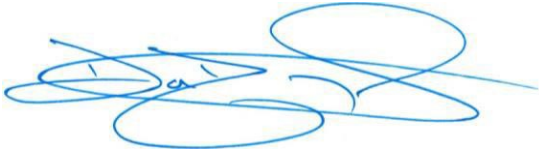
The updated Region 2 and 3 Report incorporates a new Potential Energy Corridor Addition - San Miguel/Dolores Corridor (Corridor 130-174 Potential Corridor Revision) (Regions 2 and 3 Report, p. 170-172). The proposed new corridor runs through Dry Creek Basin State Wildlife Area (SWA) and designated critical habitat for the federally threatened Gunnison sage-grouse (GUSG). In our 2018 letter, CPW recommended that designated GUSG critical habitat within the satellite populations, including Dry Creek Basin, be designated as ROW exclusion areas due to likely impacts to GUSG. In addition, CPW provided extensive comments on potential impacts to GUSG in Dry Creek Basin during the rebuild of the Tri-State Transmission line that currently runs along this proposed corridor (Attachment 3).

CPW recommends removing the San Miguel/Dolores Potential Energy Corridor Addition (Corridor 130-174 Potential Corridor Revision) from the Final Region 2 and 3 Report. If BLM and DOE move forward with this Potential Corridor Addition in the Final Report, CPW recommends following the impact minimization measures outline in our Tri-State Transmission line comments (Attachment 3), including designating the portion of this corridor that runs through Dry Creek Basin SWA and GUSG Critical Habitat as "underground only."



Thank you for the opportunity to comment on the Energy Policy Act Section 368 West-Wide Energy Corridors Region 2 and 3 Report. If you have questions about our comments, please contact CPW Southwest Region Energy Liaison, Jon Holst at (970) 375-6713.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Prenzlou". The signature is stylized with several loops and a long horizontal stroke extending to the right.

Dan Prenzlou
Director

xc: JT Romatzke, NW Region Manager
Mark Leslie, NE Region Manager
Brett Ackerman, SE Region Manager
Cory Chick, SW Region Manager
Jon Holst, SW REL
Taylor Elm, NW REL
Brandon Marette, NE REL
Karen Voltura, SE REL

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10039] - Webmaster Receipt
Date: Monday, September 23, 2019 4:01:48 PM
Attachments: [ID_10039_KaibabBandofPaiuteIndiansCommentsre368Corridors923.pdf](#)

Thank you for your input, Gregg De Bie.

The tracking number that has been assigned to your input is **10039**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 23, 2019 16:01:16 CDT

First Name: Gregg

Last Name: De Bie

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Kaibab Band of Paiute Indians

Input

Comments of the Kaibab Band of Paiute Indians Concerning August 2019 Review of Section 368 Corridors in Regions 2 and 3.

Attachments

Kaibab Band of Paiute Indians Comments re 368 Corridors 9-23.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



ELIZABETH MEYER
ALICE E. WALKER
M. CATHERINE CONDON
JENNIFER H. WALKER

GREGGOEBIE
SAMUEL R. MILLER

September 23, 2019

Via Web Form

Re: Comments of the Kaibab Band of Paiute Indians Concerning the August 2019 Review of Section 368 Corridors in Regions 2 and 3

To whom it concerns:

The Kaibab Band of Paiute Indians ("Kaibab Tribe"), through its undersigned counsel, hereby comments on the recent review of Section 368 corridors in Regions 2 and 3 by the Bureau of Land Management ("BLM"), United States Forest Service, and Department of Energy.¹ Following some relevant background information, the Kaibab Tribe describes its significant concerns with the Section 368 Corridor Review Report and the designation and continued existence of Corridor 113-116 in Region 3 through Kanab Creek Canyon, a traditional cultural property ("TCP") and sacred area that the BLM designated as an Area of Critical Environmental Concern ("ACEC") in 2008, before designating Corridor 113-116 in 2009. Consistent with the corridor siting principles, Federal Land Policy and Management Act ("FLPMA"), and other federal laws, the Kaibab Tribe also requests the BLM to delete, or alternatively revise, Corridor 113-116 in the area of the Kanab Creek ACEC.²

I. **BACKGROUND.**

This section briefly describes (1) the cultural and spiritual significance of Kanab Creek Canyon to the Kaibab Tribe; (2) the BLM's 2008 designation of the Kanab Creek ACEC with the Kaibab Tribe's cooperation and support; (3) the BLM's 2009 designation and continued existence of Corridor 113-116 as a Section 368 corridor through the Kanab Creek ACEC, which the Kaibab Tribe opposed then and opposes now; and (4) the BLM's proposed amendment to its resource management plan ("RMP") enabling a pipeline project to cross the Kanab Creek ACEC both inside and outside Corridor 113-116, which the Kaibab Tribe also opposes.

¹ See BLM ET AL., ENERGY POLICY ACT OF 2005 SECTION 368 ENERGY CORRIDOR REVIEW, REGIONS 2 AND 3 (Aug. 2019) ("Section 368 Corridor Review Report").

² The Kaibab Tribe addresses these comments to the BLM because its primary concerns are with a segment of Corridor 113-116 on BLM lands.



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A. CULTURAL AND SPIRITUAL IMPORTANCE OF KANAB CREEK CANYON AREA TO KAIBAB TRIBE.

The Kaibab Tribe's permanent homeland is the Kaibab Indian Reservation ("Reservation") in northern Arizona, just east of the town of Fredonia, and adjacent to Utah's southern border. Kanab Creek originates in Utah and enters Arizona at the Reservation. After winding on, off, and back on the Reservation, Kanab Creek finally exits the Reservation's southern boundary onto BLM lands, where it cuts increasingly high canyon walls on its way to the Grand Canyon and Colorado River. All of the Kanab Creek Canyon area falls within the Kaibab Tribe's aboriginal territory.

Since time immemorial the Kaibab Tribe has viewed the Kanab Creek Canyon area as a sacred ecological landscape that significantly contributes to the spiritual and cultural needs of Kaibab Paiute people. The Kaibab Tribal Council thus resolved in 2011 to designate Kanab Creek Canyon as a TCP, describing the area as follows:

WHEREAS, the Kaibab Paiute people have lived in this traditional land for many generations, have been taught that we have always been in this region since we were placed here by the Creator, and to the Kaibab Paiute people the Kanab Creek is a sacred place; and

WHEREAS, Our spiritual needs were taken care of and practiced within the Kanab Creek corridor before the Kaibab Paiute people were moved to the reservation in 1907, the rock writing within the canyon walls tell our story, our most sacred site is located within Kanab Creek, the canyon walls protect our Ghost Dance site, our sacred white paint is located within the Kanab Creek next to the Ghost Dance site, our sacred funeral songs traveled the Salt Song Trail up Kanab Creek from the Colorado River, trails lead from Kanab Creek to the sacred power rock, the Vulcan's Anvil which stands in the powerful Colorado River, and we believe that Kanab Creek is a sacred vein to the Colorado River; and

WHEREAS, the Kanab Creek gave the Kaibab Paiute people protection and refuge, the Kaibab Paiute people lived in the Kanab Creek corridor



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throughout the late 1800's, and the gullies and rock shelters hold the sad story of the Kaibab people being massacred; and

WHEREAS, the Kaibab Paiute Tribe has the right to be aware of and respond to all actions that may impact traditional cultural resources within the Southern Paiute sacred lands; and

WHEREAS, the Kanab Creek corridor and tributaries are accepted as sacred by the spiritual leaders of the Tribe, Tribal Elders, and the Tribal Council.³

The cultural and spiritual significance of Kanab Creek Canyon to the Kaibab Tribe must form the backdrop to every land use decision the BLM makes in this area.⁴

B. DESIGNATION OF KANAB CREEK ACEC IN 2008.

In February 2008, three years before the Kaibab Tribe designated Kanab Creek Canyon as a TCP and sacred site, the BLM Arizona Strip Field Office approved a resource management plan ("RMP")⁵ with the cooperation and support of the Kaibab Tribe. To protect cultural resources, habitat for endangered southwestern willow flycatcher, riparian and scenic values, and wilderness characteristics, the Arizona Strip RMP designated 13,148 acres immediately south of the Reservation as the Kanab Creek ACEC.⁶

³ RESOLUTION OF THE GOVERNING BODY OF THE KAIBAB BANDOFPAIUTE INDIANS, No. K-07-11 (March 17, 2011).

⁴ See 54 U.S.C. § 306108 (federal agencies must consider potential effects of their actions on historic properties); 42 U.S.C. § 4331(b)(4) (federal agencies must "use all practicable means" to "preserve important historical, cultural, and natural aspects of our national heritage"); Exec. Order No. 13007, § 1(a), 61 Fed. Reg. 26,771 (May 24, 1996) (federal agencies must "avoid adversely affecting the physical integrity of ... sacred sites").

⁵ BLM, ARIZONA STRIP FIELD OFFICE APPROVED RESOURCE MANAGEMENT PLAN (Feb. 2008) ("Arizona Strip RMP").

⁶ *Id.* at 2-57, -61, -120, -125, -127 (Map 2.23), -137, app. Hat H-2.



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The BLM also designated the Kanab Creek ACEC as a Visual Resource Management ("VRM") Class 2 area,¹ which greatly restricts new proposals to alter the landscape:

The objective of [VRM Class 2] is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.⁸

Accordingly, the BLM put the Kanab Creek ACEC in the Outback Management Unit (Primitive Travel Management Area),⁹ described as follows:

Lands within the Outback Management Unit provide opportunities for undeveloped, primitive, and self-directed recreation opportunities such as viewing scenery, hiking and walking, horseback riding, backpacking, hunting, studying nature, canyoneering, and rock climbing. The frequency of interaction with other people is low and evidence of other users is minimal.

Lands classified as within the Outback Management Unit are characterized by predominantly natural or natural-appearing environments of moderate to large size. The lowest level of landscape modifications is expected compared to the other management units. Remote settings, natural landscapes, solitude, and opportunities for primitive recreation are minimally impacted by

¹ *Id.* at 2-66 (Map 2.6).

⁸ *Id.* at 2-63. "Once established, VRM class designations are more than merely guidelines. Rather, having been developed through the RMP process, meeting the objectives of each of the respective visual resource classes is as much a part of the RMP mandate as any other aspect of the resource allocation decisions made in the RMP." *Id.* app. I at I-1. A VRM class designation "mean[s] that the visual values must be considered and those considerations documented in the decision-making process, and that if a proposed project or action is approved, a reasonable attempt must be made to meet the VRM objectives for the area in question and to minimize the visual impacts of the proposal." *Id.*

⁹ *Id.* at 2-2 (Map 2.1).



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human activity. Approximately 34 percent of public lands in the Arizona Strip [Field Office] are within the Outback Management Unit.¹⁰

Consistent with these designations and protections, the BLM promised that "[s]ignificant cultural resources will be ... maintained in good or better condition,"¹¹ and it classified the Kanab Creek ACEC as an "avoidance area," where new rights-of-way ("ROWS") "will be discouraged" unless "no reasonable alternative exists and impacts to these sensitive resources can be mitigated."¹² Generally speaking, then, the BLM must route new ROWs "away from ... cultural sites, and along the edges of avoidance areas" like the Kanab Creek ACEC.¹³

C. DESIGNATION OF CORRIDOR 113-116 AS A SECTION 368 CORRIDOR THROUGH THE KANAB CREEK ACEC.

Eleven months after establishing the Kanab Creek ACEC, the BLM amended the Arizona Strip RMP to designate Corridor 113-116, a mile-wide Section 368 corridor extending approximately from Mesquite, Nevada to Fredonia, Arizona.¹⁴ Corridor 113-116 runs south of the Reservation and directly through the Kanab Creek ACEC, but contains many large gaps in this area to avoid tribal, state, and private lands, including a nearly four-mile gap across the southeast corner of the Reservation abutting the Kanab Creek ACEC's north boundary.¹⁵

¹⁰ *Id.* at 2-4.

¹¹ *Id.* at 2-61; *accord id.* at 2-63 ("existing 'footprint' of cultural landscapes (facilities, projects, and improvements) will generally be maintained").

¹² *Id.* at 2-71; *accord id.* at 2-124 ("Proposed actions within the ACEC will be evaluated to ensure they do not adversely impact cultural resources. Where proposed ... developments may lead to adverse effects to the cultural resources, specific actions will be taken to reduce or eliminate the adverse effects. Such actions include, but are not limited to complete recordation, excavation to obtain information, redesign, relocation, incorporation of new features, or abandonment.").

¹³ *Id.* at 2-71.

¹⁴ *See* BLM, APPROVED RESOURCE MANAGEMENT PLAN AMENDMENTS/RECORD OF DECISION (ROD) FOR DESIGNATION OF ENERGY CORRIDORS ON BUREAU OF LAND MANAGEMENT-ADMINISTERED LANDS IN TIF 11 WESTERN STATES app. A at A-3 (Jan. 2009) ("Section 368 Corridor ROD"). Corridor 113-116 generally follows the Navajo-McCullough transmission line.

¹⁵ *See* Abstract for Corridor 113-116 figs. 1-4 (May 2018).



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The Kaibab Tribe did not participate in the Section 368 corridor designation process as a cooperating agency and strongly opposed the creation of Corridor 113-116. The Kaibab Tribe objected to the designation process as a general matter and asked the BLM to keep it fully involved in the designation process because the proposed Corridor 113-116 would cross "a very culturally sensitive area."¹⁶ Also, a consultant for the Kaibab Tribe predicted that the designation of Corridor 113-116 would encourage new pipeline projects requiring access roads to the bottom of Kanab Creek Canyon where, despite the existing transmission line, none currently exist.¹⁷ He further warned that "an access road would attract ATV and two-wheeled off road vehicles and open upper Kanab Creek to looting and vandalism of Indian sacred and historic sites," and that development within Corridor 113-116 "would define Kanab Creek as a sacrifice zone which would then be increasingly damaged through cumulative impacts."¹⁸

Given the Kanab Creek ACEC's important cultural and environmental values and steep rugged terrain, and the existing corridor gap across the southeast corner of the Reservation that adjoins the ACEC's north boundary, it would have made sense for the BLM to refrain from designating Corridor 113-116 in this area. Alternatively, as it did with other Section 368 corridors to minimize adverse impacts to ACECs and sensitive areas, the BLM could have reduced the width, limited use to electric transmission, and prohibited pipelines in this portion of Corridor 113-116.¹⁹ Instead, the BLM designated Corridor 113-116 across the Kanab Creek ACEC without considering its potential environmental impacts or restricting its use to minimize

¹⁶ U.S. DEPT OF ENERGY ET AL., PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT, DESIGNATION OF ENERGY CORRIDORS ON FEDERAL LAND WITHIN THE 11 WESTERN STATES (DOE/EIS-0386) vol. IV at 2,610-11 (Nov. 2008) ("Section 368 Corridor EIS") (Letter from Ona M. Segundo, Chairwoman, Kaibab Tribe, to Argonne Nat'l Lab. (Feb. 11, 2008) (Comment Doc. ID No. 50494)).

¹⁷ *Id.* at 1,385-86 (e-mail from Richard Stoffle, Univ. of Ariz. (Dec. 21, 2007) (Comment Doc. ID No. 50024)).

is *Id.*

¹⁹ *See, e.g.*, Section 368 Corridor ROD app. A at A-8 (electric only in Corridors 134-139 and 139-277 due to fragile soils), A-12 (reduced width of Corridor 47-231 to limit potential impacts to ACEC), A-13 (reduced width of and electric only in portion of Corridor 10-246 due to fragile soils and community watershed values, and reduced width of Corridor 230-248 where confined on each side by protected lands), A-14 (reduced width of portion of Corridor 11-228 to limit potential impacts to ACEC, and variable widths of Corridor 66-212 due to conditions in Moab Canyon), A-15 (electric only in Corridor 66-209 due to unstable soils).



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such impacts. The BLM boasted during the designation process that it was "particularly diligent in consulting with Tribes whose lands lie adjacent to the proposed Section 368 corridors," and that "[i]f Tribes expressed concerns over the location or nature of the proposed corridors, corridors were rerouted or modified in size and/or type in consultation with the affected Tribes,"²⁰ but this claim falls flat in the case of Corridor 113al16 and the Kanab Creek ACEC.²¹

D. PROPOSED AMENDMENT TO THE ARIZONA STRIP RMP.

In response to the State of Utah's application for a ROW to construct and operate the Lake Powell Pipeline ("LPP") both inside and outside Corridor 113-116 as it crosses the Kanab Creek ACEC, the BLM Arizona Strip Field Office found "inconsistencies" in the management directives it developed for itself, and it proposed to resolve them by amending the Arizona Strip RMP and making a portion of the Kanab Creek ACEC "compatible with utility development."²² Specifically, it proposed to:

- (1) Resolve the conflict between the designated Section 368 utility corridor and the ACEC decisions; and (2) Determine whether to allow the proposed [LPP] outside of the utility corridor, and if so, change the visual resource management class for that portion of the ACEC from Class II (where changes to the landscape should be low) to either Class III or Class IV in order to be compatible with utility development.²³

The Kaibab Tribe strongly objected to the RMP Amendment Notice,²⁴ but elected to participate

²⁰ Section 368 Corridor EIS vol. IV at 32 (response to 14.1 Concern); *accord id.* at 34 (response to 14.4 Concern).

²¹ *See id.* vol. II app. Kat K-3 to -4 (showing no revisions to Corridor 113-116 between draft and final versions of Section 368 Corridor EIS); *id.* vol. III, pt. 6 (map showing same).

²² Notice of Intent to Amend a Portion of the Arizona Strip Field Office Resource Management Plan Related to the Kanab Creek Area of Critical Environmental Concern, Arizona, 83 Fed. Reg. 29,134 (June 22, 2018) ("RMP Amendment Notice").

²³ *Id.*

²⁴ Letter from Alice E. Walker, McElroy, Meyer, Walker & Condon, P.C., to Amber Hughes, BLM, Ariz. Strip Field Office (Aug. 3, 2018).



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as a cooperating agency in developing the environmental impact statement ("EIS"),²⁵ which the Federal Energy Regulatory Commission ("FERC") will incorporate into the EIS for the LPP.

In October 2018, the Kaibab Tribe expressed some general concerns with the draft scoping report.²⁶ First, the Kaibab Tribe noted that the LPP is a water pipeline, not an energy project, and will not further the purposes of the Energy Policy Act of 2005 and Section 368 corridor designations.²⁷ Next, pointing out that the Arizona Strip RMP amendment is in large part intended to allow the LPP to stray *outside* Corridor 113-116, where management directives for Corridor 113-116 do not apply and, therefore, do not conflict with those for the Kanab Creek ACEC, the Kaibab Tribe objected to the **BLM's** claim that "conflicting" management directives "require" the Arizona Strip RMP amendment.²⁸ The Kaibab Tribe also commented that the designation of Corridor 113-116 did not obligate the BLM to approve any future projects, so the Kanab Creek ACEC's status as an "avoidance area," which is not a prohibition on new ROWs, is compatible with Corridor 113-116 and similar to the development restrictions in other Section 368 corridors to protect ACECs and sensitive areas.²⁹ Finally, the Kaibab Tribe commented that the proposed Arizona Strip RMP amendment violates FLPMA and that the ongoing review of Section 368 corridors in this matter presented "a timely opportunity to delete the corridor as it crosses the Kanab Creek ACEC or, at a minimum, impose additional development restrictions within the corridor."³⁰

After submitting its comments on the draft scoping report, the Kaibab Tribe's participation in the Arizona Strip RMP amendment process abruptly and involuntarily ended. Despite the Kaibab-BLM MOU, the BLM stopped consulting with the Kaibab Tribe on this issue, did not involve it in the formulation and evaluation of alternatives, and refused to share any draft EIS materials before turning them over to FERC.³¹ The Kaibab Tribe made repeated

²⁵ See Memorandum of Understanding between United States Department of the Interior, Bureau of Land Management, Arizona Strip District Office, and the Kaibab Band of Paiute Indians as a Cooperating Agency, Agreement No. AZ-2018-03 (Oct. 2, 2018) ("Kaibab-BLM MOU").

²⁶ Letter from Alice E. Walker, McElroy, Meyer, Walker & Condon, P.C., to Lorrain Christian, BLM, Ariz. Strip Field Office (Oct. 26, 2018) ("Kaibab **RMP** Scoping Comments").

²⁷ *Id.* at 2.

²⁸ *Id.* at 2-3.

²⁹ *Id.* at 3-4.

³⁰ *Id.* at 5.

³¹ See Kaibab-BLM MOU 1-JI IV.A.3 (requiring BLM to provide RMP amendment documents to



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requests to the BLM to review the materials, but remains in the dark about what information FERC received from the BLM. The BLM's actions effectively removed the Kaibab Tribe as a cooperating agency in the Arizona Strip RMP amendment process.

II. COMMENTS ON THE SECTION 368 CORRIDOR REVIEW REPORT.

This section sets forth the Kaibab Tribe's significant concerns with the review of Corridor 113-116 in Region 3. The comments below are organized by the section numbers in the Section 368 Corridor Review Report where the Kaibab Tribe's concerns generally arise.

A. SECTION 1.1 PURPOSE AND SCOPE.

Section 1.1 of the Section 368 Corridor Review Report states that corridor abstracts "were developed to assist the Agencies and stakeholders in identifying specific environmental concerns and other challenges, such as pinch points."³² The term "pinch points" means a corridor segment "with a considerably reduced capacity for new project infrastructure compared to the rest of the corridor ... due to challenging terrain" or other reasons.³³

The abstract for Corridor 113-116 fails to identify Kanab Creek Canyon as a pinch point even though that area is ill-suited for a pipeline project. Indeed, the State of Utah advocates the Arizona Strip RMP amendment in part so the LPP can stray outside Corridor 113-116 within the Kanab Creek ACEC and avoid, in the BLM's own words, "steep rugged terrain."³⁴ If the terrain in this segment of Corridor 113-116 cannot support a water pipeline, then clearly it meets the Section 368 Corridor Review Report's definition of a pinch point.

Kaibab Tribe), IV.B.3 (listing RMP amendment activities that Kaibab Tribe will participate in), V.D ("The BLM will involve the Cooperator in the preparation of the RMP amendment, including the formulation of alternatives and assessment of impacts."), VIII (requiring BLM to consult with Kaibab Tribe "during all phases of this process"), Attachment A (listing RMP amendment activities that Kaibab Tribe will participate in).

³² Section 368 Corridor Review Report § 1.1 at 1.

³³ *Id.* at 35 n.3.

³⁴ RMP Amendment Notice, 83 Fed. Reg. at 29,134.



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B. SECTION 2.1 CURRENT CONDITIONS AND PROJECTED GROWTH.

Section 2.1 of the Section 368 Corridor Review Report recites the first two corridor siting principles-(1) whether the corridor is thoughtfully sited to promote maximum utility and minimum impact on the environment; and (2) whether it promotes efficient use of the landscape for necessary development-and remarks that consistent with these principles the agencies assessed existing energy infrastructure, future energy development, and additional energy capacity in each Section 368 corridor.³⁵ Appendix A briefly summarizes the results of each assessment and notes that Corridor 113-116 is centered on an existing transmission line and that, even though there are no current plans for an energy project, a water pipeline, i.e., the LPP, is proposed within the corridor.³⁶ Appendix A also states that Corridor 113-116 "could support additional projects," but it is silent on the Kanab Creek ACEC and does not contain or reference any underlying analysis showing how the BLM reached this conclusion.³⁷ In addition, Appendix E lists Corridor 113-116 as "Multimodal," meaning it is "designated for electrical transmission and pipeline projects," but Appendix E is similarly silent on the Kanab Creek ACEC and lacking analysis.³⁸

The BLM's purported assessments in the Section 368 Corridor Review Report, Appendix A, and Appendix E are woefully insufficient and ignore the siting principle requiring thoughtful consideration of Corridor 113-116's environmental impacts, particularly in the Kanab Creek ACEC.³⁹ A simple review of existing energy infrastructure, planned energy development, and

³⁵ Section 368 Corridor Review Report § 2.1 at 9.

³⁶ BLM ET AL., ENERGY POLICYACT OF2005 SECTION368 ENERGY CORRIDOR REVIEW, VOLUME 2-REGIONS2 AND 3, APPENDICES:SUPPORTINGINFORMATION app. A at A-5 (Aug. 2019) ("Section 368 Corridor Review Appendices").

³⁷ *Id.*

³⁸ *Id.* app. E at E-28.

³⁹ *See* Section 368 Corridor Review Report§ 3.3 at 32 ("Where there are competing management objectives for the same Federal lands (e.g., a corridor intersects with an area designated as 'avoidance' in the land use plan), the agency staff should balance the need for responsible corridor development with the objective of minimizing adverse environmental impacts.").



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additional energy capacity does nothing to address the significant environmental concerns in the Kanab Creek ACEC, an "avoidance area"⁴⁰ that FLPMA requires the BLM to protect.⁴¹

C. SECTION 2.2 LAND USE PLANNING PROCESS AND REGIONAL REVIEWS.

Section 2.2 of the Section 368 Corridor Review Report states that the information from this review of energy corridors is being shared with other ongoing land use planning efforts. The Kaibab Tribe therefore requests that these comments be incorporated into and considered by the BLM Arizona Strip Field Office during the ongoing Arizona Strip RMP amendment process.

D. SECTION 3.2 GENERAL CONSIDERATIONS FOR FUTURE ENERGY DEVELOPMENT.

Section 3.2 of the Section 368 Corridor Review Report lists several action items to help regional and local planning offices improve the use of energy corridors while protecting resources and the environment, including the following:

- Review why a Section 368 energy corridor was not used when an authorized long-distance [energy project] has been located outside or adjacent to a Section 368 energy corridor and consider whether future revisions, deletions,

⁴⁰ Arizona Strip RMP at 2-71.

⁴¹ 43 U.S.C. § 1712(c)(3) (BLM must "give priority to the designation and protection of [ACECs]" during land use planning); *see id.* § 1702(a) (defining ACECs as "areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes "). BLM Manual § 1613.02 (Sept. 29, 1988) ("ACEC designations highlight areas where special management attention is needed to protect, and prevent irreparable damage to, important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes The ACEC designation indicates to the public that the BLM recognizes that an area has significant values and has established special management measures to protect those values. In addition designation also serves as a reminder that significant value(s) or resource(s) exist which must be accommodated when future management actions and land use proposals are considered near or within an ACEC.").



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or additions to the unused corridor segments could improve utilization of the corridor.⁴²

The LPP is neither authorized nor an energy project, but the above action item is relevant because the LPP, as proposed, will not use a portion of Corridor 113-116 within the Kanab Creek ACEC "due to steep rugged terrain which could be avoided by routing the pipeline outside of the utility corridor."⁴³

Here, where a segment of Corridor 113-116 through the Kanab Creek ACEC is not being used by a pipeline project because the terrain does not allow it, the logical result is for the **BLM** to either delete this segment of the corridor or reduce the width, limit use to electric transmission, and prohibit pipelines in this portion of the corridor. Instead, the Section 368 Corridor Review Report encourages new pipelines projects without applying the above action item to Corridor 113-116 or considering the corridor's potential impacts to the Kanab Creek ACEC, as the corridor siting principles,⁴⁴ FLPMA,⁴⁵ and other federal laws require.⁴⁶

Table 3-1 in the Section 368 Corridor Review Report notes the potential for two small revisions to Corridor 113-116 to avoid the Fort Pearce ACEC and lands with wilderness characteristics, but says nothing about the Kanab Creek ACEC or any other stretch of Corridor 113-116.⁴⁷ While the Interagency Corridor Modification Summary for Corridor 113-116 notes the possibility of revising the corridor in the area of the Kanab Creek ACEC, it does so only in passing and as one of several options for clarifying the purportedly "conflicting management objectives" in the Arizona Strip **RMP**.⁴⁸

⁴² Section 368 Corridor Review Report § 3.2 at 19.

⁴³ **RMP** Amendment Notice, 83 Fed. Reg. at 29,134.

⁴⁴ See Section 368 Corridor Review Report §§ 1.2.2 at 7, 2.1 at 9.

⁴⁵ 43 U.S.C. §§ 1702(a), 1712(c)(3).

⁴⁶ See 54 U.S.C. § 306108; 42 U.S.C. § 4331(b)(4); Exec. Order No. 13007, § 1, 61 Fed. Reg. at 26,771.

⁴⁷ Section 368 Corridor Review Report tbl. 3-1 at 26.

⁴⁸ BLM ET AL., ENERGY POLICY ACT OF 2005 SECTION 368 ENERGY CORRIDOR REVIEW, VOLUME 2- REGIONS 2 AND 3, INTERAGENCY CORRIDOR MODIFICATION SUMMARIES, POTENTIAL CORRIDOR AOMOANS AND DELETIONS at 90 (Aug. 2019) ("Section 368 Corridor Review Summaries").



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As the Kaibab Tribe emphasized to the BLM during the Arizona Strip RMP amendment scoping process, there is no conflict in the management directives for Corridor 113-116 and the Kanab Creek ACEC.⁴⁹ The alleged conflict exists only if the designation of Section 368 corridors required the BLM to approve all new ROWs within the corridors regardless of adverse impacts to ACECs and other sensitive areas, but this is not the case according to the Section 368 Corridor ROD:

Designation of Section 368 corridors and amendment of affected **RMPs** does not authorize any projects, mandate that future projects be confined to the corridors, or preclude BLM from denying a project in a designated corridor or requesting design revisions to meet unanticipated siting issues there. Future ROW proposals will need to comply with other applicable laws, regulations, and policies.⁵⁰

Since the designation of Corridor 113-116 did not remove the prior protections in place for the Kanab Creek ACEC and its important cultural resources, the BLM must scrutinize new development proposals within Corridor 113-116 to ensure they comply with those protections, balance those protections against the purpose of Corridor 113-116, and look for reasonable alternatives to avoid adverse impacts.⁵¹ This is precisely the process that the Section 368 Review Report instructs agency planning staffs to follow when addressing corridors that intersect "avoidance" areas,⁵² and nothing about this process is conflicting or inconsistent. The fact that

⁴⁹ Kaibab **RMP** Scoping Comments at 3-4.

⁵⁰ Section 368 Corridor ROD at 3-4; *accord* Section 368 Corridor EIS vol. I at 1-2 to -3 ("Section 368 *does not* require that the Agencies consider or approve specific projects, applications for rights-of-way ... , or other permits within designated energy corridors. Importantly, Section 368 *does not* direct, license, or otherwise permit any on-the-ground activity of any sort. If an applicant is interested in obtaining an authorization to site a project within any corridor designated under Section 368, the applicant would have to apply for a **ROW** authorization, and the Agencies would consider each application by applying appropriate project-specific reviews under requirements of laws and related regulations including, but not limited to, the National Environmental Policy Act ... , the Clean Water Act, the Clean Air Act, Section 7 of the Endangered Species Act ... , and Section 106 of the [NHPA]." (emphasis in original)).

⁵¹ *See* Arizona Strip RMP at 2-71, 2-124.

⁵² Section 368 Corridor Review Report § 3.3 at 32 ("Where there are competing management objectives for the same Federal lands (e.g., a corridor intersects with an area designated as



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cultural and environmental concerns in ACECs weigh particularly heavy in the balancing process and, if the BLM takes those concerns seriously, are likely to prevent large, ground-disturbing, pipeline projects in this segment of Corridor 113-116, is not a valid reason to amend the Arizona Strip RMP.

If the BLM declines to interpret its own management directives in a workable manner, however, it should delete Corridor 113-116 through the Kanab Creek ACEC by simply extending the existing corridor gap in the southeast corner of the Reservation to include the ACEC. At a minimum, the BLM must reduce the corridor's width, limit use to electric transmission, and prohibit pipelines in this segment of the corridor because the current specifications for Corridor 113-116 do not reflect any thoughtful consideration of potential impacts to the Kanab Creek ACEC.⁵³

E. SECTION 3.3 CORRIDOR MANAGEMENT.

Section 3.3 of the Section 368 Corridor Review Report finds that the minimum specifications for Section 368 corridors, i.e., length, width, and compatible uses, are insufficient to effectively administer the corridors and that land use plans should, among other things, "[s]pecify modes of corridor use (e.g., multimodal, electric transmission only, pipeline only, underground use only)" and "[i]dentify non-compatible corridor uses."⁵⁴ This section also highlights that "[w]here there are competing management objectives for the same Federal lands (e.g., a corridor intersects with an area designated as 'avoidance' in the land use plan), the

'avoidance' in the land use plan), the agency staff should balance the need for responsible corridor development with the objective of minimizing adverse environmental impacts.").

⁵³ Many other Section 368 corridors are reduced in width or restricted in use to protect ACECs and similarly sensitive areas. *See generally* Section 368 Corridor ROD app. A. Also, the presence of a pre-existing transmission line and related ROW has no bearing on whether the BLM should be encouraging, through the designation of a Section 368 corridor, major new ground-disturbing activities within the Kanab Creek ACEC, a relatively undisturbed area of cultural and spiritual significance to the Kaibab Tribe. At most the Navajo-McCullough transmission line justifies the use of Corridor 113-116 for that pre-existing use within the Kanab Creek ACEC; it does not justify additional types of use.

⁵⁴ Section 368 Corridor Review Report § 3.3 at 31.



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agency planning staff should balance the need for responsible corridor development with the objective of minimizing adverse environmental impacts."⁵⁵

Despite the prior designation of the Kanab Creek ACEC to protect its significant cultural resources and environmental values and the proven inability of Corridor 113-116 to accommodate a pipeline project in this area, the BLM designated the entire corridor for multimodal use and did not identify any non-compatible uses.⁵⁶ This is unacceptable to the Kaibab Tribe and shows a lack of concern about the issues it has repeatedly and passionately brought to the BLM's attention. After designating the mile-wide Corridor 113-116 through the Kanab Creek ACEC, over the Kaibab Tribe's objections, and without reviewing whether the corridor designation and uniform specifications made sense across the corridor's entire length, the BLM still has not conducted a meaningful review of Corridor 113-116 within the Kanab Creek ACEC. Now is the critical time for the BLM to do so.

F. SUMMARY FOR CORRIDOR 113-116.

The Kaibab Tribe has two smaller concerns with the Interagency Corridor Modification Summary for Corridor 113-116 in addition to the comments above. First, the summary cites to both the 2008 version of the Arizona Strip RMP and an amended version from 2018.⁵⁷ No amended RMP from 2018 is listed in the references, however,⁵⁸ nor is the Kaibab Tribe aware that any such **RMP** exists. If not a typographical error, the citation presumably refers to the proposed amendment to the Arizona Strip RMP initiated by the BLM in 2018 and described above, but that amendment is not final and should not be presented as final in the summary for Corridor 113-116.

Second, the summary notes that the Kaibab Tribe is "particularly" concerned about natural gas or petroleum pipelines in the Kanab Creek ACEC,⁵⁹ but the Kaibab Tribe's primary

⁵⁵ *Id.* at 32.

⁵⁶ *See* Section 368 Corridor Review Appendices app. A at A-5, app. E at E-28; Section 368 Corridor Review Summaries at 89.

⁵⁷ Section 368 Corridor Review Summaries at 89 (citing Arizona Strip RMP (BLM 2008a, as amended 2018c)).

⁵⁸ *See id.* at 178-82; Section 368 Corridor Review Report at 35-38.

⁵⁹ Section 368 Corridor Review Summaries at 90.



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concern is not with the contents of the pipeline. The Kaibab Tribe strongly opposes any major pipeline within the Kanab Creek ACEC regardless of the substance it conveys.

III. CONCLUSION.

The Kaibab Tribe appreciates the opportunity to comment on the Section 368 Review Report and share its significant concerns with the designation and continued existence of Corridor 113-116 through the Kanab Creek ACEC. The Kaibab Tribe hopes and expects that these comments will be incorporated and meaningfully addressed in the final report. In particular, the Kaibab Tribe requests the BLM to comply with the corridor siting principles, **FLPMA**, and other federal laws by either (1) deleting Corridor 113-116 in the Kanab Creek ACEC by extending the existing corridor gap from the southeast corner of the Reservation through the ACEC; or (2) at a minimum reducing the width, limiting use to electric transmission only, and prohibiting pipelines in this segment of Corridor 113-116.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gregg H. DeBie", is written over a horizontal line.

Gregg H. DeBie
Alice E. Walker
Meyer, Walker, Condon & Walker, P.C.

Attorneys for the Kaibab Band of Paiute Indians

Cc: Ona Segundo, Kaibab Chairwoman
Daniel Bullets

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10040] - Webmaster Receipt
Date: Monday, September 23, 2019 4:13:02 PM

Thank you for your input, Douglas Campbell.

The tracking number that has been assigned to your input is **10040**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 23, 2019 16:12:49 CDT

First Name: Douglas
Last Name: Campbell
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: PNM

Input

Public Service Company of New Mexico (PNM) appreciates the opportunity to comment on the Regions 2 and 3 Energy Policy Act of 2005 Section 368 Energy Corridor Review. PNM is the Balancing Authority (BA) in most parts of New Mexico and is deeply concerned that any corridor additions or deletions do not affect electric transmission system operations and reliability. During earlier rounds of Section 368 corridor evaluations, a handful of corridors were designated in New Mexico. Recently two additional corridors, the Lucky Corridor and the Santa Fe Transmission, have been proposed in sensitive areas on National Forests and other public lands. These corridors should not be passed forward for local analysis. Approval of the corridors as recommended would potentially result in reduced system reliability, increased cost to existing permit holders, revocation of valid existing FLMPA authorizations and takings of private property.

The electric transmission facilities that currently occupy these corridors have been suggested as being incapable of power delivery or that they are somehow obsolete. Nothing could be further from the truth. Today these suggested corridors contain electric transmission lines which are part of a network of high voltage transmission lines fully capable of reliably delivering renewable energy to the communities they serve. New Mexico is a state with vast renewable energy potential, far in excess of in-state demand. While it is true that sufficient transmission capacity does not currently exist to transmit all potential renewable generation to western markets, the importance of the existing facilities in these suggested corridors should not be undervalued without meaningful detailed consultation with the existing system operators and owners of these facilities on public land.

PNM strongly supports the development of renewable energy and electric transmission system additions in New Mexico. In 2003, PNM was one of the first utilities in the state to support and fully contract for the power from a 204 MW wind generation development near House, New Mexico and has continued to develop and purchase renewable resources. By 2021 there will be over 2500 MW of renewable generation interconnected to the PNM BA. PNM recently announced its goal to be emissions free by 2040. PNM has and continues to process generation

requests pursuant to the Federal Energy Regulatory Commission approved Open Access Transmission Tariff to provide interconnection for over 6700 MW of new renewable generation. Pending further engineering technical studies of the usefulness of the suggested corridors, implying they would ever provide useful economical energy pathways is at best unwarranted speculation. Please contact PNM for more information.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10041] - Webmaster Receipt
Date: Monday, September 23, 2019 5:03:35 PM
Attachments: [ID_10041_SMCFinalCommentsonWWECRegion2and3Report09232019.pdf](#)

Thank you for your input, Carmen Warfield.

The tracking number that has been assigned to your input is **10041**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 23, 2019 17:03:01 CDT

First Name: Carmen

Last Name: Warfield

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: San Miguel County, Colorado

Input

Please see attachment.

Attachments

SMC Final Comments on WWEC Region 2 and 3 Report- 09232019.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



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LANCE WARING

September 23, 2019

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Submitted electronically via blm_wo_368corridors@blm.gov

Re: San Miguel County Comments on Section 368 Energy Corridor Review Regions 2 and 3 Report, Corridor 130-274 & 130-274(E)

Dear Mr. Leverette, Mr. Smith and Dr. Smith:

Please accept the following comments from San Miguel County, Colorado, on Section 368 Energy Corridor Review- Regions 2 and 3 ("*Report*")¹ released by the Bureau of Land Management (BLM), U.S. Forest Service (USFS) and the Department of Energy (DOE) (hereafter, "*Agencies*") on August 22, 2019. During the Regions 2 and 3 review, the Section 368 Interagency Workgroup and stakeholders evaluated energy corridor placement on Federal lands managed by both the BLM and the USFS across Colorado, including San Miguel County, and other states.

We appreciate the opportunity to comment on the energy corridor for Region 2, Corridor 130-274/130-274(E). San Miguel County has been engaged in the Section 368 Corridor process as co-plaintiffs in the

¹ Section 368 Energy Corridor Review, Regions 2 and 3. Available at <http://corridoreis.anl.gov/regional-reviews/regions-2-3/>. The Report includes "Corridor Summaries" and "Appendices," also available on the webpage.

2012 Settlement Agreement². The Settlement Agreement caused the Agencies to conduct Section 368 energy corridor regional reviews in order to examine current relevant information and stakeholder input on the corridors, including Corridors of Concern³, and based on this information, identify potential revisions, deletions, or additions to the corridors for consideration during future land use planning at the local level. The corridor summaries included with the Report detail the findings related to each corridor, including potential corridor revisions, deletions, and additions. The potential corridor revisions, deletions, and additions must reflect application of the corridor Settlement objectives, principal components, and siting principles⁴ to appropriately balance the need for safe and reliable energy connectivity with concerns for potential resource impacts on public lands and National Forest System lands.

The agencies also identified potential IOP revisions, deletions, or additions. The Executive Summary of the Report states that the “findings will help inform potential improvements to the West-wide energy corridors (sometimes referred to as “368 corridors” due to their designation in accordance with Section 368 of the Energy Policy Act), as well as advance the Presidential priority of improving the Federal environmental review and permitting for infrastructure projects outlined in Executive Order 13807.”

San Miguel County appreciates the coordination and efforts of the Agencies working toward meeting the terms of the 2012 Settlement Agreement with co-plaintiffs through reevaluation of energy corridor designations and recommendations and undertaking periodic reviews of these corridors.

San Miguel County has the responsibility of ensuring the health, safety, and welfare within the County. Our responsibility extends to environmental health, which includes watershed health, soil health, and protection of wildlife habitat. Environmental quality is very important to San Miguel County. San Miguel County collaborates, cooperates, and coordinates with federal land agencies on federal land planning and projects. Sixty percent of the land in San Miguel County is federal public land. Four percent is owned by the State of Colorado. Seventy percent of San Miguel County is a federal mineral estate.

San Miguel County has assisted in the protection of thousands of acres of private lands with important wildlife habitat values, especially Gunnison sage grouse (GuSG) critical habitat by participating in the acquisition of conservation easements intended to preserve and protect GuSG habitat. San Miguel County has financially contributed over \$2.5 million of local taxpayer dollars for GuSG habitat conservation and improvements through the County’s Land Heritage Program, co-funding of the

² http://corridoreis.anl.gov/documents/docs/Settlement_Agreement_Package.pdf

³ Corridors of concern are corridors identified by plaintiffs in the Settlement Agreement as having specific environmental issues. Corridors of concern and the specific environmental issues are located in Appendix A of the Settlement Agreement and include the Corridor intersecting San Miguel County, Corridor 130-274/130-274(E).

⁴ These are summarized on the Settlement Agreement Overview webpage: <http://corridoreis.anl.gov/regional-reviews/settlement/>. Siting principles to be used in future siting recommendations: ● sited to provide maximum utility and minimum impact to the environment; ● promote efficient use of the landscape for necessary development; ● appropriate and acceptable uses are defined for specific corridors; and ● corridors provide connectivity to renewable energy generation to the maximum extent possible while also considering other sources of generation.

Gunnison Sage Grouse Working Group and funding additional GuSG recovery and resilience efforts. Through our collaborative work and funding, approximately 25 percent of the occupied habitat and 7 percent of the unoccupied habitat of the San Miguel Basin population of the GuSG has been encumbered with conservation easements. Hundreds of Zeedyk structures have been constructed in San Miguel County GuSG habitat to restore and enhance wet meadow which are vital to GuSG for successful brood rearing. Some of the conserved land and land managed by Colorado Parks and Wildlife for GuSG in State Wildlife Areas were at risk by the original alignment and designation of Corridor 130-274/130-274(E), which is contrary to the siting principles in the Settlement.

SMC continues to actively participate with the stakeholder group that developed the Gunnison Sage-grouse Rangewide Conservation Plan.⁵ San Miguel County has been a Cooperating Agency for the BLM Gunnison Sage-Grouse (GuSG) Rangewide Resource Management Plan (RMP) Amendments and Environmental Impact Statement (EIS) process.⁶

A. General Comments and Recommendations on Regions 2 and 3 Report

I. Analysis and Mapping Tools

During the review process several tools were developed to facilitate the regional review process. Since the Agencies will be undertaking periodic reviews of these corridors and IOPs, the corridor abstracts, conflict assessment tables, and the Section 368 Energy Corridor Mapping Tool should be systematically kept up to date and remain available on the West-wide Energy Corridor Information Center project website at <http://www.corridoreis.anl.gov>. Please see San Miguel County's previous comments dated February 28, 2018 for recommendations on what should be included in the conflict assessment tables.⁷

II. Broadband

We encourage the Agencies to require that any Corridor that is providing a ROW for fiber or broadband infrastructure, be required to make such broadband infrastructure open access and available for any purpose, including commercial use, to avoid the need for future easement perfection efforts.

III. Interagency Operating Procedures (IOPs)

The Report proposes adding new IOPs for wildlife migration corridors and habitat and also for tribal concerns and ethnographic studies.⁸ We support the addition of these

⁵ <https://cpw.state.co.us/learn/Pages/GunnisonSagegrouseConservationPlan.aspx>

⁶ <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=39681>

⁷ See pages 8 and 11-12.

⁸ Report, p 32.

IOPs. For IOPs to be successful, they should be clear and incorporated into all appropriate guides or manuals with training.

IV. Areas of Critical Environmental Concerns (ACECs)

The BLM defines ACECs as "...[a]reas where special management attention is needed to protect important historical, cultural, and scenic values, or fish and wildlife or other natural resources."⁹ Based on federal law, agency policy and the purpose of the current planning effort, the Agencies should avoid designating corridors in ACECs and identify them as "high potential conflict areas," requiring any projects be sited, designed, constructed and operated in a manner that produces no net loss of habitat and populations of special status and other species in the ACEC.

B. Comments and Recommendations Specific to Corridor 130-274 & 130-274(E)

San Miguel County supports the recommended deletions and additions, with clarifications for consistency and meeting siting principles. We commend the Section 368 Interagency Workgroup and Agencies for taking the additional effort to analyze these corridors and propose recommendations that will help mitigate the conflicts and concerns to comply with the Settlement and siting principles.

The Report describes this corridor under potential deletions and additions.¹⁰ Table 3-1 recommends that MP 0 to MP 32 of Corridor 130-274 and all of Corridor 130-274(E) be deleted. San Miguel County supports this recommendation and requests that it be implemented in the relevant Land Use Plans of the BLM and USFS as soon as possible.

The County has provided comments throughout this Settlement-initiated corridor review process requesting deletion because there is no way to access the existing corridor alignment without crossing private and state lands that are critical to GuSG, including lands less than 0.6 mile from active leks.

Of the approximately 32 miles recommended for deletion, less than 9 miles of Corridor 130-274/130-274(E) is on federal land. The MPs labeled in the existing Corridor Summary figures (including Figure 3.5-38a of this Report¹¹) are not labeled and positioned in the figures so that they actually correspond with the locations of the existing infrastructure mentioned in Appendix A¹². This has the effect of not showing the significant degree of conflict between the existing Corridor 130-274 alignment, existing infrastructure, and GuSG critical habitat and lek buffers, where they cross non-federal land. To utilize the existing WWEC corridor alignment, infrastructure must cross private land, private land with conservation easements, state wildlife area lands protecting GuSG habitat, and pass very close to active GuSG leks. The existing infrastructure is not a valid precedent for future ROWs. This infrastructure was constructed decades before the recognition of the GuSG as a distinct grouse species in 2000, and also

⁹ Bureau of Land Management. Areas of Critical Environmental Concern, <https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations/acec>. Accessed July 21, 2018.

¹⁰ Report, p. 28. (pdf pg 36)

¹¹ Report, Regions 2 and 3 Corridor Summaries, p. 116

¹² Report, Appendix A, p. A-2

was constructed prior to the listing of the Gunnison Sage-grouse as a threatened species protected by the Endangered Species Act (ESA) and designation of critical habitat in 2014. The recommended deletion and addition for Corridors 130-274/130-274(E) will still have approximately 4 miles of conflict with GuSG habitat, but Tri-State has successfully completed the NEPA and a line upgrade post-GuSG listing. We are providing suggestions to further mitigate the GuSG conflict for the recommended addition elsewhere in this letter.

Corridor # and Location	Potential Revision, Deletion, or Addition	Rationale
Potential Corridor Deletions		
130-274 Colorado	Partial deletion: Consider deleting segment from MP 0 to MP 32 and deleting Corridor 130-274(E).	The portions of Corridor 130-274 that are being considered for deletion are not consistent with the siting principles or the potential addition of the San Miguel/Dolores Corridor. Corridor 130-274 does not contain infrastructure from MP 0 to MP 32 and during the past 10 years has not served as a preferred pathway to support electric transmission infrastructure. Deleting this portion of the corridor would also minimize potential impacts on conservation easements on private land to protect GUSG and would minimize potential impacts on scenery values in this area. Without Corridor 130-274, Corridor 130-274(E) is an isolated parcel that does not promote efficient use of the landscape or maximize utility.
Potential Corridor Additions		
Potential Corridor Addition (San Miguel/ Dolores Corridor) Colorado	Addition: Consider adding a new corridor to replace Corridor 130-274/130-274(E). The potential corridor addition would be in alignment with a recently upgraded 230-kV transmission line in the northern portion of the potential corridor addition and would follow a local road in the southern portion.	The potential corridor addition would maximize utility by collocating with existing infrastructure and would minimize potential impacts by avoiding lands with wilderness characteristics and conservation easements to protect GUSG. The potential corridor addition would also minimize potential visual resource conflicts by aligning the corridor with existing infrastructure and would promote efficient use of the landscape by providing a continuous north-south corridor through a large portion of western Colorado.
<p>Figure 1: Report Table 3-1 showing rows pertaining to Corridor of Concern and interest to San Miguel County: 130-274/130-274(E).</p>		

Suggested Corrections, Clarifications, and Refinements for the Report, Appendices, and Corridor 130-274 Summary – Deletions Section:

1. Update the reference to the existing Land Use Plan, Uncompahgre Basin RMP (BLM 1989)¹³, to reference the updated plan as the Uncompahgre Proposed RMP and FEIS¹⁴ are currently in the 30-day protest period.
2. Appendix C, Table C-1 lists the Land Use Plans associated with each corridor. For Corridor 130-274, the reference to “Uncompahgre Basin RMP [Uncompahgre Draft RMP (BLM 2016)]”¹⁵ will need to be updated. The Uncompahgre Proposed RMP and FEIS¹⁶ are currently in the 30-day protest period.
3. Corridor 130-274/130-274(E) (San Juan/San Miguel Corridor) Corridor Summary on page 117 – the first sentence of the first bullet reads, “Partially delete Corridor 130-274 (MP 0 to MP 10),” which appears to be a typo because elsewhere in the Report and supplementals the recommendation is delete MP 0-32 of 130-274 and all of 130-274(E). This sentence needs to be corrected to read, “Partially delete Corridor 130-274 (MP 0 to **MP 32**) **and entirely delete Corridor 130-274(E).**”
4. Amend Figure 3.5-38c.¹⁷ and clarify that the new addition/replacement Corridor 130-274 will be aligned to use the existing Tri-State 230-kv electricity line as the western limit of the corridor. The corridor should narrow if possible, to avoid disturbance of GuSG habitat. Using the Tri-State alignment as the western limit of the corridor rather than the center line, will further minimize impacts to GuSG habitat and keep energy infrastructure as far away from an active lek as possible. It should emphasize that infrastructure should be undergrounded within the 4-mile lek buffer. This amendment would comply with the siting principles.

¹³ Corridor Summaries, p. 116.

¹⁴<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageId=86004>

¹⁵ Report, Appendix C, Table 3-1, p. C-1

¹⁶ <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageId=86004>

¹⁷ Report, Regions 2 and 3 Corridor Summaries, p. 118

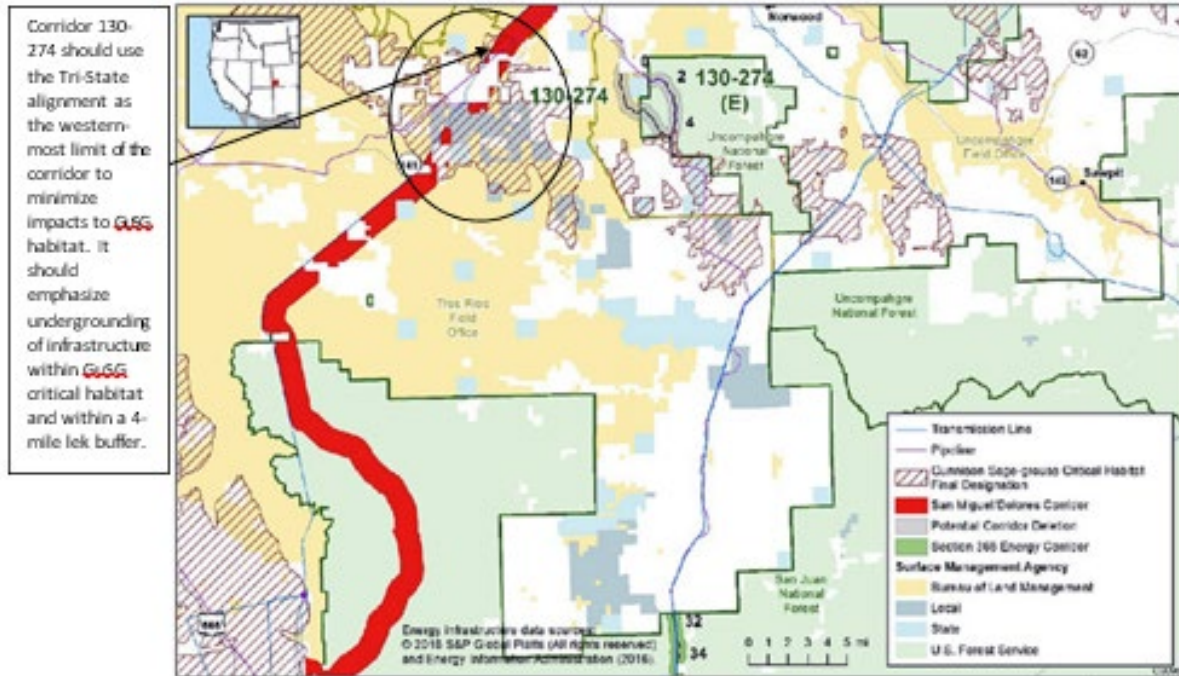


Figure 3.5-38c. Potential Revision to Corridor 130-274 and Corridor 130-274(E).

5. The Corridor Summary states, “There is an opportunity to consider a new IOP for NSTs and NHTs as well as adding an IOP related to visual resources to ensure appropriate consideration occurs for future development within the energy corridor.”¹⁸ San Miguel County encourages the Agencies to implement IOPs for National Historic Trails (NHT) or National Scenic Trails (NST) and visual resources. San Miguel County’s economy benefits from heritage tourism and the unique scenic vistas enjoyed from roads, routes, trails and public lands.

Suggested Corrections, Clarifications, and Refinements for the Report, Appendices, and Corridor 130-274 Summary – Additions Section:

1. Update the reference to the existing Land Use Plan, Uncompahgre Basin RMP (BLM 1989),¹⁹ to reference the updated plan as the Uncompahgre Proposed RMP and FEIS²⁰ are currently in the 30-day protest period.
2. Similar to the above comment regarding Figure 3.5-38c, amend Figure 3.6-4²¹ and clarify that the new addition/replacement Corridor 130-274 will be aligned to use the existing Tri-State 230-kv electricity line as the western limit of the corridor. The corridor should narrow if possible, to

¹⁸ Report, Regions 2 and 3 Corridor Summaries, p. 170

¹⁹ Report, Regions 2 and 3 Corridor Summaries, p. 170

²⁰ <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageId=86004>

²¹ Report, Regions 2 and 3 Corridor Summaries, p. 170

avoid disturbance of GuSG habitat. Using the Tri-State alignment as the western limit of the corridor rather than the center line, will further minimize impacts to GuSG habitat and keep energy infrastructure as far away from an active lek as possible. It should emphasize that infrastructure should be undergrounded within the 4-mile lek buffer. This amendment would comply with the siting principles.



Figure 3.6-4. San Miguel County Potential Corridor Addition.

3. The text on p. 170 of the Corridor Summaries states, “The potential corridor addition should be aligned so that the existing 230-kV transmission line is the western boundary of the corridor rather than the centerline to avoid ACECs, VRM Class II areas, and Lands with Wilderness Characteristics. The Agencies propose a 6,000-ft. wide corridor for maximum flexibility to avoid GuSG leks and better avoid critical habitat and do not suggest full build-out of the entire corridor width.” This does not seem to be depicted in the provided Figure 3.5-38c and Figure 3.6-4. The width of 6,000 feet seems questionable, given that the Tri-State alignment has existing access roads along the ROW and the upgrade from a 115-kv to 230-kv line was accomplished after the listing of the GuSG as Threatened and after designation of critical habitat.
4. We support the statement in the text on p. 170 of the Corridor Summaries which states, “The Agencies should coordinate with Colorado Parks and Wildlife to identify conservation easements along the route identified as a potential corridor addition. The potential corridor addition crosses GuSG critical habitat and would require mitigation and IOPs to minimize impacts.” However, compensatory mitigation payments should be required when sensitive species are impacted, to further meet the siting principles.

5. Where the corridor summary deletion section discusses a recommendation of IOPs for NHTs, NSTs, and visual resources, the corridor summary addition section does not recommend any IOPs specific to the new alignment. There should be a clear recommendation for visual resources and protection of special characteristics and habitats within ACECs, LWWCs, and special wetlands and soils.

C. Conclusion

Thank you for the opportunity to provide our comments on the Region Report, Corridor 130-274/130-274(E) and the need for these segments within San Miguel County to be rerouted. Your recommendations for deletions and re-routing are on the right track and with additional clarifications and corrections of inconsistencies between the report and its supplemental elements, the revisions to Corridor 130-274 and 130-274(E) should be implemented as soon as possible.

We look forward to working with the Agencies and stakeholders to perfect and incorporate the proposed deletions and additions to Corridor 130-274 and 130-274(E) to mitigate the concerns outlined in the Settlement Agreement and goals of the Agencies, and avoid impacts to the Gunnison sage grouse. We are happy to provide any assistance or data we might have to better inform the Corridor mapping tool, abstract and analysis.

Sincerely,
SAN MIGUEL COUNTY, COLORADO
BOARD OF COUNTY COMMISSIONERS

/signed/
Kris Holstrom, Chair

CC via email: Jeremy Bluma, BLM(jbluma@blm.gov)
Georgeann Smale, BLM (gsmale@blm.gov)
Reggie Woodruff, USFS (rwoodruff@fs.fed.us)

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10042] - Webmaster Receipt
Date: Friday, September 27, 2019 12:01:00 PM

Thank you for your input, Nathaniel Snively.

The tracking number that has been assigned to your input is **10042**. Please refer to the tracking number in all correspondence relating to your input.

Date: September 27, 2019 12:00:33 CDT

First Name: Nathaniel

Last Name: Snively

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Bureau of Reclamation Yuma Area Office

Input

The Bureau of Reclamation, Yuma Area Office has no comment regarding regions 2 and 3.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10043] - Webmaster Receipt
Date: Wednesday, October 9, 2019 3:26:22 PM
Attachments: [ID_10043_010032016003ACBCI10_9_2019.pdf](#)

Thank you for your input, Lacy Padilla.

The tracking number that has been assigned to your input is **10043**. Please refer to the tracking number in all correspondence relating to your input.

Date: October 09, 2019 15:26:05 CDT

First Name: Lacy
Last Name: Padilla
Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Agua Caliente Band of Cahuilla Indians

Input

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Section 368 Energy Corridor Review Region 1 Report. This project is located within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

*A cultural resource inventory of the corridor area by a qualified archaeologist prior to ROW approval and development.

*Cultural resources should be avoided whenever possible during ground disturbing activities.

*The presence of an approved Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys) within the Section 368 energy corridor.

*Consultation on any proposal for the use of Corridor 30-52.

*Continued consultation on this project.

Thank you,

Lacy Padilla
Archaeologist
Tribal Historic Preservation Office
AGUA CALIENTE BAND OF CAHUILLA INDIANS

Attachments

01-003-2016-003ACBCI10_9_2019.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



October 09, 2019

[VIA EMAIL TO:jchildre@blm.gov]
Bureau of Land Management (BLM)
Ms. Jane Childress

Re: 368 Corridor Review Region 1 Report

Dear Ms. Jane Childress,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the West-wide Energy Corridor Programmatic Environmental Impact Statement (PEIS) project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

- *A cultural resource inventory of the corridor area by a qualified archaeologist prior to ROW approval and development.
- *Cultural resources should be avoided whenever possible during ground disturbing activities.
- *The presence of an approved Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys) within the Section 368 energy corridor.
- *Consultation on any proposal for the use of Corridor 30-52.
- *Continued consultation on this project.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6956. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Lacy Padilla
Archaeologist
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 2 and 3 Report Input [10044] - Webmaster Receipt
Date: Wednesday, October 9, 2019 4:55:43 PM
Attachments: [ID_10044_CDOTR3WestWideEnergyCorridorComments20191008.pdf](#)

Thank you for your input, Catherine Ventling.

The tracking number that has been assigned to your input is **10044**. Please refer to the tracking number in all correspondence relating to your input.

Date: October 09, 2019 16:55:30 CDT

First Name: Catherine
Last Name: Ventling
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Colorado DOT

Input

Please find attached comments

Attachments

CDOT R3 West Wide Energy Corridor Comments 2019 10 08.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



COLORADO
Department of Transportation

Region 3 Planning and Environmental Unit
222 South 6th Street, #317
Grand Junction, CO 81501

<<< VIA E-MAIL >>>

October 8, 2019

Addressee...

RE: CDOT R3 Environmental Comments for the West Wide Energy Corridor

To Whom It May Concern:

Thank you for the opportunity to comment on the West-wide Energy Corridor report and corridor summaries. CDOT is operating under the knowledge of Department of Interior's Secretarial Order 3362, and Colorado Executive Order [D 2019-011](#), which provides for both habitat connectivity and transportation conflict reduction. Colorado Department of Transportation (CDOT) and Colorado Parks and Wildlife (CPW) have recently completed a study to understand priority highways to mitigate for wildlife-transportation conflicts. The Western Slope Wildlife Prioritization Study can be accessed here for reference:

<https://www.codot.gov/programs/research/pdfs/2019/WSWPS>.

The study produced 24 priority highway segments in CDOT Region 3 (NW Colorado) and 24 priority highway segments in CDOT Region 5 (SW Colorado). In an effort to implement ideas stemming from this study, CDOT and CPW are collaborating with BLM and others to review the transportation-wildlife conflicts in this region (Northwest Colorado). The goal is to effectively and economically reduce those conflicts, improve travel safety, reduce animal vehicle collisions, and mitigate the economic impacts that the conflicts create. In many cases, the best way to achieve this goal is with exclusion fencing to separate wildlife from vehicles, however habitat connectivity must be preserved as well. As this work progresses, we anticipate the addition of various physical structures near highways to achieve the goals. Some of these structures could be wildlife overpasses, wildlife underpasses, wildlife fencing, deer guards (double length cattle guards), escape ramps, and access gates for vehicle and pedestrian traffic connecting to the State highway system.





Specific WVEC Corridor Comments

These additions to the landscape have several implications for multiple uses on the public lands adjacent and connected to the highway system. A few of these might be:

Corridor 138-143

This section of the corridor overlaps the highway markers ~ 101-128. Since the project mileposts are relating to the energy corridor itself and not the state highway, this is a little confusing because they don't correspond to what is on the highway markers for drivers.

There are two high priority segments for wildlife-transportation mitigation and all road segments in Corridor 138-143 are in the CDOT Regional 23rd percentile for priority ranking. The segment from MP 99-114 is currently in the design phase for a highway project which includes specific measures to reduce wildlife conflicts and allow for permeability.

Corridor 133-142

This corridor is fairly removed to the south (+1 mile) of US 40 between Maybell and Craig, Colorado. Nonetheless, two large highway segments in this stretch of US 40 have been identified as high priority. These segments total 16 miles of potential treatments on US 40 between highway markers 62-82. No current project design efforts are in progress. All road segments in this area on US 40 and SH 318 are in the CDOT Regional 23rd percentile for priority ranking. Future road projects could combine wildlife-transportation conflict actions if to opportunity and funding arrive. CDOT is concerned that roads from or near the highway system or activities associated with the energy corridor could impact or preclude the effectiveness of wildlife crossing structures.

These wildlife priority segments are also the subject of review of alternatives for the Uinta Basin Railway Surface Transportation Board EIS. CDOT and CPW is concerned about the impacts the railway proposal has to wildlife connectivity. The railway actions may negate the future plans to reduce known impacts through our transportation and habitat plans. The railway and the energy corridor combined actions may cumulatively increase impacts to wildlife in this area, more than the current highway impacts. Associated human activities, new roads, and a railway would further disconnect local and migrating animals from habitats and collisions would result in more animal deaths/injuries.

Corridor 126-133

There is only one high priority segment for wildlife-transportation mitigation in Corridor 126-133. This priority segment is Highway 40 MP 40.5-41.5 or project MP 37. It is only 1 mile in length and has a low potential to be built in the near future due to its size and lack of nearby planned highway projects. In general, this corridor is less concerning





regarding transportation wildlife impacts when compared to other areas of Region 3. The majority of the highway segments in this corridor are less than the 70 percentile for prioritization.

Corridor 132-133

Much of this corridor is not a direct concern for CDOT. However, where the corridor is near Highway 64 MP 45.5 to 61.6 there is a cluster of higher wildlife transportation conflicts. These segments which overlap the corridor have priority percentiles from 70-94%. While there are no immediate plans for projects to reduce the known conflicts, incidental project opportunities may arise with non-wildlife highway work.

Corridor 132-276

The northern part of this corridor is situated in a heavy wildlife migration corridor including Craig to Meeker, and to a lesser extent Meeker to Rifle. There are several segments of highway near corridor 132-276 that are identified as CDOT top 5% priority between Craig and Rifle. The remaining highway segments that are within one mile from the corridor range from 0 to 94 % priority. To reduce wildlife transportation conflicts, it is highly likely that CDOT, CPW and additional partners will implement projects in these areas in the near term. Two projects in preliminary design are SH 13 MP 73-75.7 south of Hamilton and SH 13 MP 58.5-70.5 north of Meeker. These roughly correspond to the *corridor MP* of 98-115. This area is critical for wildlife and any measures to reduce cumulative effects from multiple industries and uses on the landscape may produce synergistic results. Lowering the allowable structures and need of for additional access roads and human occupancy in this area could help relieve pressure from transportation.

The southern portion of this corridor is adjacent to Interstate 70 which currently has near full coverage of exclusion fencing and multiple below grade crossings to reduce animal transportation conflicts. Additional fencing as well as exclusion devices to the on/off ramps were installed in 2019 (Rifle to Mesa County line).

Corridor 144-275

A small 5% priority segment is identified on SH 131 MP 58-59 which corresponds to corridor MP 94. This small priority segment is not likely to have implementation actions in the near future. Two other 5% priority segments are identified on SH 9 south of Kremmling, however these segments were addressed in a large highway and wildlife project completed in 2016. The remaining highway segments that are within one mile of this corridor are ranked with 17-94% priorities, most of which are on SH 131 from Oak Creek to Toponas and SH 134 from Toponas to Kremmling. Any implementation actions to reduce animal transportation conflicts are not likely in the near term.





Corridor 132-136

This corridor does not overlap with any high priority segments for wildlife transportation conflicts. Highway segments that are within one mile of this corridor are ranked between 9-52 percentile for priorities. The existing conflicts are relatively low compared to other highway segments and it is very unlikely any implementation actions would occur in the future.

Corridor 134-136

This corridor does not overlap with any high priority segments or come within a mile of State highways.

Corridor 131-134

This corridor does not overlap with any high priority segments or come within a mile of State highways.

Corridor 136-277

This corridor does not overlap with any high priority (5%) segments for wildlife transportation conflicts. Highway segments, on US 50, that are within one mile of this corridor MP 11-30 are ranked between 5-92% prioritization, with higher priority area surrounding Cimarron. The existing conflicts are relatively low compared to other highway segments and it is unlikely implementation actions would occur in the near future.

Corridor 136-139

This corridor does not overlap with any high priority segments or come within a mile of State highways.

Corridor 87-277

Much of this corridor does not overlap high priority (5%) segments for wildlife transportation conflicts. However, west of Poncha Springs in US 50, corridor MP 60-65, a priority segment is identified. This segment on US 50 MP 211.5-214.5 has some potential for implementation in the near future. The remaining highway segments that are within one mile of this corridor are ranked between 14-92% for priority.

Corridor 130-131N

This corridor does not overlap with any high priority (5%) segments for wildlife transportation conflicts. Highway segments, on SH 141 and SH 145 fall between 50-61 percentile for priority. The existing conflicts are relatively low compared to other highway segments and it is very unlikely any implementation actions would occur in the future.





Corridor 130-131S

This corridor does not overlap with any high priority segments or come within a mile of State highways.

Corridor 130-274E

This corridor does not overlap with any high priority segments or come within a mile of State highways.

Corridor 130-274

Much of this corridor is removed from State highway systems. There are two locations where the corridor crosses State highways, at SH 145 near corridor MP 41 and at SH 160 near corridor MP 65. Highway segments, on SH 145, that are within one mile of this corridor are identified between 35-60% prioritization. Highway segments, on SH 160, that are within one mile of this corridor are identified between 82-93% prioritization. While there are no immediate plans for projects to reduce the known conflicts, incidental project opportunities may arise with non-wildlife highway work.

Corridor 73-133

This corridor does not overlap with any high priority segments or come within a mile of State highways.

Corridor 136-277

This corridor does not overlap with any high priority (5%) segments for wildlife transportation conflicts. Highway segments, on US 50, that are within one mile of this corridor MP 11-30 are ranked between 5-92% prioritization, with higher priority area surrounding Cimarron. The existing conflicts are relatively low compared to other highway segments and it is unlikely implementation actions would occur in the near future.

Corridor 136-139

This corridor does not overlap with any high priority segments or come within a mile of State highways.





Corridor 87-277

Much of this corridor does not overlap high priority (5%) segments for wildlife transportation conflicts. However, west of Poncha Springs in US 50, corridor MP 60-65, a priority segment is identified. This segment on US 50 MP 211.5-214.5 has some

potential for implementation in the near future. The remaining highway segments that are within one mile of this corridor are ranked between 14-92% for priority. CDOT understands that the planning for the future of energy corridors must take into account numerous considerations and that final decisions may not always align with CDOT's efforts to reduce transportation-wildlife conflicts in the region. By proactively providing feedback and insight into highway transportation efforts in the area, CDOT would encourage the agencies to acknowledge such efforts in this corridor plan in hopes that future collaboration, and management changes between agencies can facilitate effective implementation and success of wildlife mitigation strategies.

Sincerely,

Catherine Ventling
R3 Environmental Manager



September 17, 2019

**Comments on project E2020-35:
Section 368 Energy Corridor Review
Volume 2 – Regions 2 and 3**

In response to the review of future energy corridor designations in southern Nevada, specifically sections that pass through southern Lincoln County, NV, the Nevada Division of Forestry (NDF) has identified project corridors that may intersect habitat for state listed critically endangered plants. Any individual of a species designated as critically endangered by the state of Nevada may not be removed or destroyed without a permit issued by the state forester (NRS 527.260 – 527.300). Therefore, special analyses must be conducted for any potential projects occurring in:

- Corridor 39-113 (East Apex/Mormon Mesa to St. George)
- Corridor 113-114 (Mesquite to Milford)
- Corridor 113-116 (Mesquite to Fredonia Corridor)

NDF encourages avoidance of critically endangered plant habitat as much as possible. Please take that into consideration for project planning activities.

Sincerely,

Cayenne Engel
Resource Management Officer
Nevada Division of Forestry
4747 Vegas Drive
Las Vegas, NV 89108
cengel@forestry.nv.gov
702-486-5123 x228

RE: Nevada State Clearinghouse Notice E2020-35 (E2020-35 Section 368 Energy Corridor Review - Elko, Eureka, White Pine, and Lincoln Counties)

Deann M. McKay

Wed 8/28/2019 10:40 AM

To: NevadaClearinghouse <NevadaClearinghouse@lands.nv.gov>;

Good Morning Andre,

Should any of portion of the corridor described in the attached proposal cross land owned by the State of Nevada, an application along with associated application fee will need to be submitted to the Nevada Division of State Lands. The application can be found at: http://lands.nv.gov/uploads/documents/APPLICATION_FORM_StateLands2019Fillable.pdf

If there are any questions or need for further discussion, please contact Deann McKay, NDSL Supervisory Land Agent, at (775)684-2729 or via email at

Thank you.

From: NevadaClearinghouse@lands.nv.gov <NevadaClearinghouse@lands.nv.gov>

Sent: Friday, August 23, 2019 4:04 PM

To: >;

NEVADA STATE CLEARINGHOUSE

Department of Conservation and Natural Resources, Division of State Lands
901 S. Stewart St., Ste. 5003, Carson City, Nevada 89701-5246
(775) 684-2723 Fax (775) 684-2721

TRANSMISSION DATE: 08/23/2019

U.S. Bureau of Land Management

Nevada State Clearinghouse Notice E2020-35

Project: E2020-35 Section 368 Energy Corridor Review - Elko, Eureka, White Pine, and Lincoln Counties

Follow the link below to find information concerning the above-mentioned project for your review and comment.

[E2020-35](http://clearinghouse.nv.gov/public/Notice/2020/E2020-35.pdf) - <http://clearinghouse.nv.gov/public/Notice/2020/E2020-35.pdf>

- **Please evaluate this project's effects on your agency's plans and programs and any other issues that you are aware of that might be pertinent to applicable laws and regulations.**
- **Please reply directly from this e-mail and attach your comments.**
- **Please submit your comments no later than Friday September 20th, 2019.**

[Clearinghouse project archive](#)

Questions? Andre Emme, Program Manager, (775) 684-2733 or nevadaclearinghouse@state.nv.us

No comment on this project

Proposal supported as written

AGENCY COMMENTS:

Signature:

Date:

Requested By:

Searchlight_Wind_Energy_EIS Tom Reid

Distribution:

- 99ABW Nellis

- Department of Conservation & Natural Resources

- Intermountain Range

Alan Jenne - Department of Wildlife, Elko

Alisanne Maffei - Department of Administration

Alysa Keller - Legislative Counsel Bureau

Amanda Evans - NACO

Andre Emme - Nevada Division of State Lands

Andrea Randall - Southern Nevada Water Authority

Ann Bedlion - NAS Fallon

Anna Higgins - Nevada Division of Forestry

Bart Chambers - State Fire Marshall Office

Bettina Scherer - Conservation Districts

Birgit Henson - NDEP

Bob Turner - Nellis AFB

Brenda Hunt - CWSD

Caleb McAdoo - NDOW

Carl Erquiaga - Theodore Roosevelt Conservation Partnership

Cathy Erskine - Dept of Conservation and Natural Resources

Cayenne Engel - Nevada Division of Forestry

Chad Giesinger - Washoe County

Chad Mellison - U.S. Fish and Wildlife Service

Chelsea Kincheloe - Carson City Parks, Recreation and Open Spaces Department

Chris Thorson - Division of Water Resources

Christina Wilson - Fire Marshal Office

Christina Wilson - State Fire Marshall Office

Chuck King - Hawthorne Army Depot

Clifford Banuelos - Inter-Tribal Council of Nevada, Inc.

Cory Lytle - Lincoln County

Craig Mortimore - Wild Nevada

Cynthia Turiczek - Public Utilities Commission

D. Bradford Hardenbrook - Department of Wildlife, Las Vegas

Dan Huser - Sagebrush Ecosystem Technical Team

David Bobzien - Nevada State Energy Office

David David - UNR Bureau of Mines
David Mouat - Desert Research Institute
Deann McKay - State Land Office
Dennis Zabaglo - Tahoe Regional Planning Agency
Donna Withers - NAS Fallon
Ed Ryan - Smith and Mason Valleys Conservation District
Eddy Quaglieri P.E. - Carson City Public Works Department
Ellery Stahler - Nevada Division of State Lands
Eric Miskow - Nevada Natural Heritage Program
Garrett Wake - Nevada Division of Minerals
Gary Reese - Nevada Division of Forestry
Genevieve A. Skora - US Fish and Wildlife Service
Greg Lovato - NDEP
Greg McKay - NV OHV Commission
Heather Drake - Nevada Department of Taxation, Local Government, Centrally Assessed Property
Ian Kono - Nevada Division of Water Resources
J Crandell - Colorado River Commission of Nevada
James D. Morefield - Natural Heritage Program
Janice Keillor - Nevada Division of State Parks
Jasmine Kleiber - NDOW
Jason Salisbury - Nevada Department of Wildlife
Jenni Jeffers - Nevada Department of Wildlife
Jennifer Newmark - NDOW - Wildlife Diversity
Jered McDonald - Legislative Counsel Bureau
Jim Balderson - NDEP
Jim English - Washoe County
John Christopherson - Nevada Division of Forestry
John Muntean - UNR Bureau of Mines
Jon Price - UNR Bureau of Mines
Kacey KC - Nevada Division of Forestry
Karen Beckley - State Health Division
Kelli Anderson - Division of Emergency Management
Kelly Eagan - Esmeralda County
Kelly McGowan - Sagebrush Ecosystem Technical Team
Kelly Thomas - NDEP
Kenny Pirkle - Nevada Department of Wildlife
Kevin Verre - NDOT
Kim Borgzinner - NDEP
Kimberly Caringer - Tahoe Regional Planning Agency
Kris Urquhart - Nevada Department of Wildlife
Kristin Szabo - Nevada Natural Heritage Program
Kurt Haukohl - NDOT
Larry Cruz - Hawthorne Army Depot
Lee Ann Carranza - U.S. Fish and Wildlife Service
Lee Bonner - NDOT
Lindsey Lesmeister - NDOW
Lori M. Story - Attorney General
Louis Groffman - Nevada Department of Transportation
Lowell Price - Commission on Minerals
Major Brian Hunsaker - Nevada National Guard
Mark Costa - NDOT
Mark Enders - NDOW
Mark Freese - Department of Wildlife
Matt Maples - NDOW

Meghan Brown - Dept of Agriculture
Meredith Gosejohan - Tahoe Resource Team - Division of State Lands
Michael J. Stewart - Legislative Counsel Bureau
Michael Visher - Division of Minerals
Micheline Fairbank - Nevada Division of Water Water Resources
Michelle Stamates -
Mike Miller - City of Fallon Public Works
Mitch Ison - NDOT
Miteshell Lanham - Lander County
Moir Kolada - NDOW
Paul Nielsen - Tahoe Regional Planning Agency
Peggy Roefer - Colorado River Commission
Rebecca Palmer - State Historic Preservation Office
Rich Perry - Nevada Division of Minerals
Richard Arnold - Nevada Indian Commission
Robert Rule - NAS Fallon
Roland Shaw - NTRT
Ryan Shane - Nevada Division of Forestry
Samantha R. Essig -
Samantha Thompson - Dept of Conservation and Natural Resources
Sandy Quilici - Department of Conservation & Natural Resources
Sarah Hills - NDEP
Seth Johnson - Public Utilities Commission
Sherry Rupert - Indian Commission
Shimi Mathew - Nellis AFB
Shirley DeCrona - Nevada Division of State Parks
Stephanie Simpson - NDEP
Susan Cooper - US Fish and Wildlife Service
Susan Scholley - Legislative Counsel Bureau
Tara Vogel - US Fish and Wildlife Service
Terry Rubald - Nevada Department of Taxation, Local Government, Centrally Assessed Property
Tim Mueller - Department of Transportation
Tim Rubald -
Tod Oppenborn - Nellis Air Force Base
Tracy Kipke - NDOW
Tyler Klimas - Washington Office
Valerie King - NDEP
W. Russell Norman - California Water Resources Control
Warren Turkett - Colorado River Commission of Nevada
Wes Henderson - Nevada League of Cities
Zach Ormsby -
Zip Upham - NAS Fallon

Defenders of Wildlife | The Wilderness Society | Center for Biological Diversity
Southern Utah Wilderness Alliance | The National Audubon Society
Center for Large Landscape Conservation | Wildlands Network
Wilderness Workshop | National Parks Conservation Association
Sierra Club Grand Canyon Chapter

September 23, 2019

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Submitted electronically via blm_wo_368corridors@blm.gov

Re: Comments on Section 368 Energy Corridor Review Regions 2 and 3 Report

Dear Mr. Leverette, Mr. Smith and Dr. Smith:

Please accept the following comments from Defenders of Wildlife, The Wilderness Society, Center for Biological Diversity, Southern Utah Wilderness Alliance, the National Audubon Society, Center for Large Landscape Conservation, Wildlands Network, Wilderness Workshop, National Parks Conservation Association, and Sierra Club Grand Canyon Chapter on Section 368 Energy

Corridor Review- Regions 2 and 3 (“Report”)¹ released by the Bureau of Land Management (BLM), U.S. Forest Service (USFS) and the Department of Energy (DOE) (collectively the “Agencies”) on August 22, 2019.

Defenders of Wildlife (“Defenders”) is dedicated to protecting native animals and plants in their natural communities. Founded in 1947, Defenders is a national conservation organization that represents approximately 1.8 million members and supporters in the United States and around the world who are concerned with wildlife and habitat conservation, including on public lands in the West.

The Wilderness Society (“TWS”) is a leading public lands conservation organization that seeks to protect wilderness and other wild public lands. Since 1935, TWS has been dedicated to protecting America’s wild places for current and future generations. We are also committed to smart and sensible regulation and management of our public lands to ensure that where energy development does occur it is done in a safe and responsible manner. We are working to ensure climate change due to activities on our public lands is minimized, especially by promoting renewable energy development.

The Center for Biological Diversity (“Center”) is a non-profit public interest organization with offices located across the country including offices in Oakland and Los Angeles, California, representing more than 1.6 million members and online activists nationwide dedicated to the conservation and recovery of species at-risk of extinction and their habitats. The Center has long-standing interest in siting of corridors on public lands and has actively participated in the siting process for specific corridors and in these regional reviews.

The Southern Utah Wilderness Alliance (“SUWA”) is a non-profit environmental membership organization with members in all fifty states and offices in Washington, D.C. and Utah. It is dedicated to the sensible management of all federal public lands within the State of Utah, the preservation and protection of plant and animal species, the protection of clean air and water found on federal public lands, the preservation and protection of cultural and archaeological resources, and the permanent preservation of Utah’s remaining wild lands.

The National Audubon Society (“Audubon”) protects birds and the places they need, today and tomorrow, throughout the Americas using science, advocacy, education, and on-the-ground conservation. Audubon’s reach spans over one million members, nearly 500 local chapters, and 23 affiliated state offices across the country. Since 1905, Audubon has worked to shape effective conservation plans in diverse ecosystems, educate the public through nature centers and citizen science projects, and manage designated Important Bird Areas (IBAs) for species throughout the Western Hemisphere.

Founded in 2007 in Bozeman, Montana, The Center for Large Landscape Conservation (“CLLC”) catalyzes, advances, and supports large landscape conservation throughout the American West. We do this by developing science, crafting policy, and supporting planning. Together with our partners, we form a world-wide network of conservation professionals, scientists, and decision

¹ Section 368 Energy Corridor Review, Regions 2 and 3. Available at <http://corridoreis.anl.gov/regional-reviews/regions-2-3/>. The Report includes “Corridor Summaries” and “Appendices,” also available on the webpage.

makers. We believe that ecological connectivity should be part and parcel of the management of our public lands.

The mission of Wildlands Network (“Network”) is to reconnect, restore and rewild North America so that the diversity of life can thrive. We envision a world where nature is unbroken, and where humans co-exist in harmony with the land and its wild inhabitants.

Wilderness Workshop (“WW”) is a 501(c)(3) dedicated to preservation and conservation of the wilderness and natural resources of the White River National Forest and surrounding public lands. WW engages in research, education, legal advocacy and grassroots organizing to protect the ecological integrity of local landscapes and public lands. WW was founded in 1967 and has approximately 800 members, many who live, work, and recreate on, and otherwise use and enjoy our shared public lands in Colorado. WW staff and members have a great interest in the protection and enhancement of natural values, wildlands and wildlife.

For 100 years, the nonpartisan National Parks Conservation Association (“NPCA”) has been the leading voice in safeguarding our national parks. NPCA and its more than 1.3 million members and supporters work together to protect and preserve our nation’s most iconic and inspirational places for future generations.

A. Introduction

Our organizations have a long history of engagement in the Section 368 West-wide Energy Corridors (WWECs) planning process. In 2012, several of our groups were part of the settlement agreement² in which the Agencies and other stakeholders agreed to, among other things, reevaluate energy corridor designations on public lands in the west and undertake periodic reviews of those corridors. Since then, our organizations have provided extensive comments in 2014, 2016, 2018 and 2019 as part of these reviews.

The WWECs provide the Agencies a significant opportunity to apply a directed development, “smart from the start” approach to transmission planning in furtherance of both clean energy and wildlife conservation objectives on public lands. The planning process also provides the BLM an important opportunity to support its Solar Energy Program and the Wind and Solar Leasing Rule by identifying new corridors and modifying existing corridors to incentivize transmission and development in low-conflict areas. Without transmission, many of the solar energy zones (SEZs) that BLM identified and designated in the Solar Energy Program Programmatic Environmental Impact Statement will fail to attract development interest.

While we continue to support the planning process for energy corridors, specifically transmission corridors that would facilitate renewable energy development in the west, we also have some concerns and recommendations on both the WWEC regional review process as well as specific designated corridors within Region 2 and 3.

² Wilderness Soc’y et al. v. U.S. Dep’t of Interior, No. 3:09-cv-03048 JW (N.D. Cal.) (July 3, 2012).

B. General Comments and Recommendations on Regions 2 and 3 Report

I. Current Conditions and Projected Growth

The Report provides helpful information on how the corridors align with various other regional planning efforts for renewable energy and transmission development in Regions 2 and 3 and specifically which corridors have the potential to facilitate renewable energy development.

The Report identifies six corridors³ that are within five miles of SEZs in Regions 2 and 3 designated under the 2012 Western Solar Plan. We appreciate that the Agencies have identified specific corridors that could provide transmission to renewable energy generation as stipulated in the 2012 settlement agreement.

Recognizing the importance of transitioning away from fossil fuel toward renewable energy sources, we recommend that the Agencies perform additional analysis on where fossil fuel power plants are anticipated to be retired in the near future and how that will affect existing transmission capacity and the Section 368 corridors. This analysis will help understand where new capacity may become available that could facilitate transmission of renewable energy without the need for new infrastructure. Alternatively, the Agencies could incorporate analysis prepared by the Energy Information Administration and published in the Electric Power Monthly Report (June 2019).⁴ Incorporating this information into the final report would help identify and plan for use of existing infrastructure, where possible, thereby reducing both the costs and ecological impacts associated with constructing additional infrastructure in the region. This type of analysis is consistent with the siting principles in the 2012 settlement agreement.

The Report cites a 2018 conducted by National Renewable Energy Laboratory⁵ which found that

- In general, electric transmission projects already under development will largely meet projected future transmission needs, according to the Western Electricity Coordinating Council (WECC), in their common case (“expected future”) scenario for the Western Interconnection. Accordingly, demand for future development within the West-wide energy corridors is anticipated to be low over the next 10 to 15 years.
- Under WECC scenarios with higher than expected renewable energy development, the West-wide energy corridors in Nevada, Utah, and New Mexico might see additional development interest in the near future.
- For interstate natural gas pipeline development in the West, the outlook for additional development in the near term appears to be moderate to low, based on a 2015 DOE study.

This indicates that there may not be a huge demand for either new electric transmission lines or natural gas pipelines except to facilitate renewable energy development in Nevada, Utah and New

³ Gillespie SEZ in Arizona, Afton SEZ in New Mexico, Milford Flats, Escalante Valley, and Wah Wah Valley SEZs in Utah, and Dry Lake Valley North SEZ in Nevada.

⁴ Electric Power Monthly (with Data for April 2019), Table 6.6, “Planned U.S. Electric Generating Unit Retirements.” Available at https://www.eia.gov/electricity/monthly/current_month/epm.pdf

⁵ Energy Futures Synthesis for West-Wide Section 368 Corridors. Available at <https://www.nrel.gov/docs/fy18osti/71464.pdf> and included as Appendix B.

Mexico. Therefore, we would caution the Agencies against especially designating new corridors where there may not be a demand and where conflicts may be high but also against retaining corridors with high resource conflicts.

II. Interagency Operating Procedures (IOPs)

The Report proposes adding new IOPs for wildlife migration corridors and tribal concerns and ethnographic studies.⁶ We support the addition of these IOPs.

We also note that the Report states that “the Agencies should *consider* adding an IOP related to wildlife migration corridors and habitat.”⁷ Since the potential impacts of transmission construction on wildlife migration and habitat could be extensive, we recommend that the Agencies *commit* to adding the IOP instead of just *considering* it.

Furthermore, the Report states that “...the Agencies have determined that the IOPs are sometimes poorly understood and inconsistently used.”⁸ Since the IOPs are important to address resource concerns, it is important that agency staff be well-versed on the implementation of the Section 368 corridors and the IOPs. We recommend that IOPs be specifically addressed in the WWEC Guidebook and made part of the training for agency staff as stipulated in Section II.A.3 of the 2012 settlement agreement. We also request the Agencies to clarify the timeline for the publication of the guidebook.

We also recommend adding specific IOPs for ecological resources and new IOPs for access roads as described below.

a. IOP for wildlife migration corridors and habitat

We agree with the statement in the Report that adding an IOP related to wildlife migration corridors and habitat “[w]ould help ensure that appropriate consideration of wildlife migration corridors and habitat occurs in connection with evaluation of proposed development in Section 368 energy corridors.”⁹ Many Section 368 energy corridors in Regions 2 and 3 cross through wildlife migration corridors and habitat for wildlife, including species listed under the Endangered Species Act, such as Gunnison sage-grouse (*Centrocercus minimus*), Agassiz’s desert tortoise (*Gopherus agassizii*), Mexican spotted owl (*Strix occidentalis lucida*), and jaguar (*Panthera onca*). The construction and operation of electric transmission lines and natural gas pipelines within these corridors could fragment habitat and affect movement of these species, introduce and facilitate invasive species into the project area, or facilitate unlawful species take. We support the addition of a wildlife migration IOP. Finally, we appreciate that the Agencies have recognized the need to adhere to Secretarial Order 3362, particularly, Section 3(d) that calls for “[r]eview and use the best available science to inform development of specific guidelines for the Department’s lands and waters related to planning and developing energy, transmission, or other relevant projects to avoid or minimize potential

⁶ Report, p 32.

⁷ *Id.* (emphasis added).

⁸ *Id.*

⁹ *Id.*

negative impacts on wildlife”)¹⁰ should be adhered to when developing the new IPO, as we also recommended in April 2019 during the regional review process for Regions 4, 5 and 6.

We encourage the Agencies to gather and summarize the best available science and make it readily available to decision-makers and planners; identify specific actions for working with states in context of the corridor review process; and explain how the state wildlife action plans (WAP)¹¹ will be consulted. We have attached a map in Exhibit 1, which depicts big game winter habitat areas identified in state WAPs for reference.

In addition, we request the Agencies to add data layers for big game migration corridors in Arizona, New Mexico, Colorado, Utah, and Nevada to the Section 368 Energy Corridor Mapping Tool.

Furthermore, we recommend adding the following specific IOPs on wildlife migration corridor and habitat.

- Activities within wildlife corridors/linkages for special status species that may have a negative impact on connectivity will require further evaluation in environmental document(s) of the effects on long-term population viability. The analysis will consider the extent of suitable habitat, including areas required for climate adaptation, needed to ensure viability within each linkage given local population density, long-term demographic and genetic needs, degree of existing habitat disturbance/impacts, current causes of mortality, and the latest population viability modeling. Activities that would compromise the long-term viability of a corridor/linkage population or the function of the linkage, as determined by the lead Agencies, in coordination with the U.S. Fish and Wildlife Service and state wildlife agency, are prohibited and will require reconfiguration or re-siting.

b. IOP for tribal concerns and ethnographic studies

While we do not have expertise on tribal engagement and/or conducting ethnographic studies, we support the addition of IOPs that would encourage, facilitate and enhance tribal consultation opportunities. Recognizing that many Section 368 corridors intersect tribal lands and areas of cultural significance, it is important that tribal concerns be taken into account during corridor designation and infrastructure development. This would ensure that tribal interests and cultural issues are given due consideration along with other interests which is crucial for advancing the intended purpose of promoting environmentally responsible Right-of-Way (ROW) siting decisions.

III. Areas of Critical Environmental Concerns (ACECs)

As mentioned in our previous comment letters, we continue to contend that ACECs should be avoided in corridor designations and at a minimum ACECs should be classified as “high potential conflict areas.”

¹⁰ Secretarial Order 3362. (2018) Available at https://www.doi.gov/sites/doi.gov/files/uploads/so_3362_migration.pdf.

¹¹ Available at <https://www.nfwf.org/westernmigrations/Pages/state-action-plans.aspx>

ACECs are areas “where special management attention is required.... to protect and prevent irreparable damage to important historical, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes...”¹² Section 202(c)(3) of the Federal Land Policy and Management Act (FLPMA) of 1976¹³ requires BLM in land use planning to “[g]ive priority to the designation and protection of areas of critical environmental concern.” Allowing development, including new development such as pipelines or transmission lines, in ACECs is likely to impact ACECs and the values for which they were recognized and designated. Based on federal law and policy and the purpose of the current planning effort, the Agencies should avoid designating corridors in ACECs and identify them as “high potential conflict areas,” requiring any projects be sited, designed, constructed and operated in a manner that produces no net loss of habitat and populations of special status and other species in the ACEC.

IV. Research Natural Areas (RNAs) and Outstanding Natural Areas (ONAs)

Both the USFS and the BLM designate Research Natural Areas (RNAs) on public lands under their jurisdiction. RNAs are established to preserve outstanding, unique or representative natural habitats or features for both conservation and research purposes.¹⁴ They often protect native plant communities and can also be important for protecting threatened or endangered species.¹⁵ Similarly, administratively designated ONAs are areas with high scenic values that have been little altered by human impact. Under current BLM policy, RNAs must meet the relevance and importance criteria of ACECs.¹⁶ As of 2017, BLM managed 207 RNAs totaling more than 1.5 million acres¹⁷ and the USFS managed more than 450 RNAs encompassing more than 570,000 acres.¹⁸

We recommend that the Agencies identify RNAs and ONAs intersected by Section 368 corridors and add a data layer for RNAs and ONAs to the online corridor mapping tool.¹⁹ In addition, we recommend that the RNAs and ONAs be avoided in corridor designations where possible and at a minimum be classified as “high potential conflict areas.”

V. Lands with Wilderness Characteristics (LWC)

BLM lands with wilderness characteristics (LWC) are addressed many times in the Report. These areas—which are large natural areas that provide opportunities for solitude or primitive and unconfined recreation—need to be fully protected from infrastructure that could destroy their wilderness values. In some of the corridors the Agencies have plans to avoid these areas, which we support, but in a number of areas there would remain conflicts with intersected LWC, which we

¹² 43 CFR §1601.0–5

¹³ 43 U.S.C. 1702.

¹⁴ 43 CFR §§ 8223.0-5, 8223.1.

¹⁵ 43 CFR § 8223.0-5.

¹⁷ 43 CFR § 1610.7-2

¹⁷ BLM Public Land Statistics 2017, p. 229.

¹⁸ “Research Natural Areas” (webpage), <https://www.fs.usda.gov/detail/r1/specialplaces/?cid=stelprdb5172218>. Accessed July 21, 2019.

¹⁹ A current list of BLM-designated ACECs, including RNAs and ONAs are available at <https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations/acec>. Similarly, a current list of USFS-designated RNAs is available at <https://www.fs.fed.us/psw/rna/description.shtml>.

think must be avoided, or at least mitigated with IOP. While in many cases the BLM may not have made final management decisions in the governing Resource Management Plan (RMP) about how LWC in the area will be managed, the Agencies in designating the West-Wide Energy Corridors should not contribute to decision making that would degrade or even destroy LWC values. The option of protecting wilderness values in LWC must be preserved. This will have the benefit of giving BLM latitude to ensure these areas are fully protected in future RMP decision-making.

We have attached two exhibits files that show BLM LWCs and Forest Service Roadless areas that the Agencies must to seek to avoid in their corridor designations. Exhibit 2 is an updated analysis of BLM LWCs and Forest Service Roadless Areas that must be avoided. It shows whether the overlaps between the wilderness quality lands and the corridor are new or were previously designated. It also shows the acreage of the potential overlap. Exhibit 3 shows areas where corridors could be adjusted to avoid wilderness conflicts. It shows the mileposts where there should be a potential adjustment and whether this is new or previously designated as a needed adjustment. We request the Agencies to consider this information for the final corridor designations.

These exhibits have largely been incorporated into our comments with the exception of following corridors from Regions 2 and 3:

Corridor 62-211 at MP 9-12, 11-21, 21, 36, and 37-49, Arizona: Corridor intersects with the Tonto National Forest, USFS recommended wilderness areas at MP 9-12, 11-21, 21, 36, and 37-49. These intersections go unaddressed in the Agencies Report. The Agencies must seek to avoid Forest Service potential wilderness areas in the corridors that are designated.

Corridor 144-275 at MP 3-4, and MP 12-14, Colorado: Corridor intersects with Colorado Roadless Area in Arapahoe & Roosevelt National Forest at MP 3-4 (Bard Creek Roadless Area) and MP 12-14. These intersections go unaddressed in the Agencies report. The Agencies must seek to avoid the roadless areas.

In several corridor summaries the Agencies state that “[T]here is an opportunity to develop an IOP to provide guidance on the review process for lands with wilderness characteristics applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.”²⁰ We support the statement and encourage the Agencies to develop IOP for LWC. The IOP, when developed could be applicable to all corridors that may be intersecting or in close vicinity of LWC. The IOP would help maximize the utility of the corridors and minimize impact on LWC.

C. Corridor Specific Comments and Recommendations

In addition to the issues and recommendations stated above, we offer the following comments on potential corridors revisions, deletions and additions in Regions 2 and 3.

²⁰ Examples include Corridor 66-212 (Corridor Summaries, p. 39), Corridor 73-133, (Corridor Summaries, p. 48), Corridor 110-233 (Corridor Summaries, p. 82), Corridor 126-218 (Corridor Summaries, p. 109) etc.

I. Corridors Revisions

a. Corridor 113-116, Arizona

Revision shifts corridor south between MP 20-26. This shift results in conflict with Beaver Dam Mountains Wilderness. Specifically, there are 1,927 acres of overlap with the potential corridor revision and the Wilderness area. We would recommend narrowing the corridor at MP 20-25. Wilderness units must be avoided.

b. Corridor 234-235, Arizona

Revision shifts the corridor slightly west at MP 8. This shift results in conflict with an IRA unit: Tumacacori. There are 74 acres of overlap with the potential corridor revision and the IRA. We would recommend narrowing the corridor or shifting it slightly east at MP 8. IRA units must be avoided. In addition, we recommend that the corridor be moved to the east between MP 0 and 7 to avoid critical habitat for Jaguar.

c. Corridor 87-277, Colorado

This corridor runs through central Colorado in the vicinity of Salida, Gunnison, and Montrose. In our Corridor Abstract comments, we asked the Agencies to ensure comprehensive assessment and close consultation with the National Park Service relative to potential impacts to the Curecanti National Recreation Area and Black Canyon of the Gunnison National Park. This corridor cuts through the most important remaining Gunnison sage-grouse (listed as a threatened species under the Endangered Species Act) habitat in the Gunnison Basin, and there is a high likelihood of impacts to cooperative protection efforts by the National Park Service and other Agencies.

The Agencies show potential deletions that would narrow the corridor in certain areas to avoid LWCs and a roadless area, specifically in Gunnison Field Office.²¹ In addition, although no specific revision has been identified, the report states the Agencies will “consider alternate routes to avoid or minimize impacts on Gunnison Sage-grouse critical habitat during the land use planning process,”²² and that IOPs to protect historic trails and wildlife migration corridors could be considered for this corridor.²³

The Agencies need to ensure that they have adequately consulted with the National Park Service to ensure there are needed protections for the Curecanti National Recreation Area and Black Canyon of the Gunnison National Park along this corridor. We appreciate that enhanced protections for the Gunnison sage-grouse are being considered, but we request that the Agencies prepare a definite protection plan beyond stating that “no specific revisions have been identified.”

We acknowledge and appreciate that in the Gunnison Field Office, potential revisions avoid conflict with LWC units. However, in the Royal Gorge Field Office, the potential revision/addition avoids northern LWC units, but the shift causes new intersections with southern LWC units. Specifically, there are 387 acres overlap with the corridor revision and BLM LWC at MP 38-42 with LWC Unit COF-020-056. There is also 107 acres of overlap with BLM LWC and the potential revision at MP 33 with LWC unit COF-020-019. At MP 108-111, the corridor avoids ACEC conflict

²¹ Report, p. 25. See also Corridor Summaries at 68 and Appendix E-11.

²² Report, p. 25.

²³ Corridor Summaries, p. 71.

to the north, but the potential revision results in more ACEC conflict to the south (South Beaver Creek ACEC). We recommend narrowing the corridor in these areas

We also note intersection in the Royal Gorge Field Office with Colorado Roadless Areas in the Pike and San Isabel National Forests. At MP 52-53 the corridor would overlap with the Sangre de Cristo: Silverheels Gulch to Hunts Creek Roadless Area, and at MP 68-69 the corridor would overlap with the Chipeta Roadless Area. Although no specific revision has been identified, the Agencies will consider shifting “the corridor [...] where appropriate [...] to avoid overlap with USFS roadless areas.”²⁴ We believe impacts to Forest Service Roadless Areas must be avoided.

Corridor 87-277 is identified as a Corridor of Concern because it traverses conservation resources. In our comments, we highlighted our concerns regarding the WWEC and the potential impact to sensitives resources if BLM retains the existing designation. While we appreciate that the potential revisions could alleviate some conflict in the Gunnison Field Office, significant conflicts remain in the Royal Gorge Field Office. The Agencies should therefore either eliminate the corridor to alleviate resource conflicts or fully consider ways to improve Corridor 87-277 and avoid intersections with conservation resources.

This corridor will also be discussed below in Section III. a.

d. Corridor 113-114, Nevada

This potential revision intersects Nevada BLM LWC with 9,613 acres of overlap. Specifically, units 0180-1-2011, 0144-1-2012, and 0120-1-2012 from the Ely LWC dataset are intersected. We would not recommend shifting the corridor west or it will intersect Clover Mountains Wilderness. Shifting east will create more intersections with BLM LWC. Overall, we do not support this potential addition.

e. Corridor 81-272, New Mexico

This section of the corridor is near Socorro west of I-25. In our previous comments on this corridor, we had asked that this corridor segment be rerouted to avoid intersection with the Magdalena Mountains Citizen-Inventoried LWC unit, critical habitat for Southwestern Willow Flycatcher and Desert bighorn sheep, and the Elephant Butte Lake State Park Important Bird Area (IBA). This area contains important wildlife habitat and contains isolated mesas and major canyons leading into the mountain range.

The Report recommends “[r]ealigning the corridor between MP 0 and MP 40 with the authorized route for the SunZia Southwest Transmission Project.”²⁵ This change would collocate the corridor with existing infrastructure, avoid impacts to the El Camino Real de Tierra Adentro National Historic Trail, avoid the Elephant Butte Lake State Park IBA hence minimizing impacts to wildlife, and avoid a crossing of the Rio Grande River.²⁶ This change is in the vicinity of Truth or Consequences.²⁷

²⁴ Corridor Summaries, p. 72.

²⁵ Report, p. 24.

²⁶ *Id.* See also Appendix E-10 to 11.

²⁷ Corridor Summaries, p. 63. (Fig. 3.5-22b).

The Agencies also suggest a possible revision between MP 100 and MP 109 which would avoid the Ladron Mountain-Devil's Backbone Complex ACEC and redirect the corridor around the Seville National Wildlife Refuge.²⁸ Noting the intersection of the corridor with the Ladron Mountain Devil's Backbone Complex ACEC, which excludes the authorization of ROWs, the Agencies write that "revising the corridor, revising the ACEC boundary, or providing clarification that avoiding the ACEC has already been reviewed and the best method to meet the siting principles is through minimizing or mitigating impacts on a case-by-case basis."²⁹

The Agencies are ignoring our concerns about wilderness quality lands at MP 85-91 in the more northern portion of this corridor. This needs to be reconsidered and we hereby reincorporate the comments we made on this issue relative to this corridor in our February 23, 2018 comments and ask that the Agencies fully consider those concerns and publish a response to them.

This potential revision intersects with the Las Cruces Field Office BLM LWC Unit: Nutt Grasslands (367 acres of overlap). We would recommend shifting the revision slightly west away from where it intersects with the LWC.

We also note that the Report contemplates designating the corridor underground only along portions of the SunZia alignment and that the corridor revision would be dependent on the construction of the SunZia transmission line.³⁰ This raises the question of how the corridor designation would be consistent with the SunZia transmission line which is not contemplated to be underground along this section. We recommend that the Agencies provide a clarification on how the ROW permit for SunZia would be affected by the designation or conversely how the revised corridor designation would affect the ROW.

f. Corridor 89-271, New Mexico

This lengthy corridor is in the southeast part of the state running from near Jal to near Vaughn. These MP are near the center of the corridor in New Mexico. Previously, we asked that the Agencies consider opportunities for corridor revision by following existing State Highway 176, State Highway 62 towards Carlsbad, and route north on State Highway 360 until it terminates at State Highway 82 to avoid Lesser Prairie Chicken and Dunes Sagebrush habitat and to consider revising MP 77 to 78 of the corridor to eliminate the intersection with the Mescalero Sands Citizens-Inventoried LWC unit.

The Report indicates that the Agencies will consider shifting the corridor west at MP 64 for approximately 12 miles and then north to meet an existing corridor at MP 85.³¹ This would reduce impacts to Lesser Prairie Chicken habitat and collocate with existing infrastructure on BLM lands. It appears the area of concern at MP 77-78 on the existing corridor would be avoided with this change, but the potential addition will result in an intersection with the western edge of the LWC

²⁸ *Id.* p. 62.

²⁹ *Id.*

³⁰ *Id.* 62.

³¹ Report, p. 25. See also Appendix E-11.

unit.³² A BLM resource management plan amendment established an ACEC that seeks to protect habitat for the Dunes Sagebrush Lizard in this area.³³

The BLM also notes an intersection with the Roswell Cave Complex ACEC, a designated exclusion area for major ROWs and argues for a “need to provide clarification on the management prescriptions in the land use plan: options include revising the corridor to the north to follow an existing pipeline, revising the ACEC boundary or revising the management prescriptions.”³⁴

Lastly, the BLM writes that the first 100 miles of the corridor “are located within the Planning Area for the Pecos District 2008 Special Status Species-RMPA and was designated as only available for buried transmission and pipelines to reduce conflicts with special status species and their habitats. It was determined that transmission line routes should avoid crossing through suitable or occupied habitat for prairie chicken and lizard species.”³⁵

g. Corridor 81-213, New Mexico

This potential revision intersects the Peloncillo Mountains Wilderness. There are 63 acres overlap. We would suggest shifting the corridor south where it intersects with Wilderness. The revision also intersects the Peloncillo Mountains Wilderness Study Area near the Western border of New Mexico and the Continental Divide Trail. This potential revision also intersects with AZ BLM LWC, Safford FO. There are also the following overlaps: Stewart Canyon unit (1,990 acres overlap), Whitehorse unit (5 acres overlap), Pack Trail unit (10 acres overlap), and the Fan unit (804 acres overlap). Wilderness areas must be avoided.

h. Corridor 116-206, Utah

This corridor runs roughly along U.S. Highway 89 from in the vicinity of Kanab to north of Circleville with this area of concern being in the south near the Grand Staircase Escalante National Monument. In our Corridor Abstract comments, we asked that the Agencies adjust the corridor to avoid Greater Sage-grouse Priority Habitat Management Area (PHMA) and to avoid impacts to wilderness quality lands and that if this could not be done that the corridor be eliminated. The corridor bisects the BLM LWC units Upper Kanab Creek and Vermillion Cliffs and the proposal follows no existing disturbance in this area and would therefore result in a significant and unacceptable loss of wilderness characteristics throughout the LWC units. Additionally, the corridor touches on the eastern boundary of the Vermilion Cliffs LWC unit and is in close proximity to the Grand Staircase-Escalante National Monument.

While the Agencies are considering realignment of this corridor at MP 53-79, the report does not indicate any proposed changes at MP 17-24.³⁶ The proposed shift from MP 53-79 to align with US Hwy 89 would not result in avoidance of PHMA but would potentially minimize impacts to sage-grouse through collocation.³⁷

³² Corridor Summaries, p. 74. (Fig. 3.5-24c).

³³ Appendix C-5.

³⁴ Corridor Summaries, p. 73.

³⁵ *Id.*

³⁶ Report, p. 26.

³⁷ *Id.*

We request the Agencies to reconsider and propose changes at MP 17-24 also to avoid the Upper Kanab Creek and Vermillion Cliffs LWCs as proposed in our Corridor Abstract comments.

i. Corridor 110-114, Utah

The Utah section of this corridor runs from in the vicinity of Milford to the vicinity of Garrison in the West Desert. In our Corridor Abstract comments, we asked the Agencies to avoid Greater Sage-grouse PHMAs where possible and to adjust the corridor in these areas to avoid wilderness quality lands or to otherwise consider eliminating it. The corridor would directly impact the Central Wah Wah Mountains BLM LWC unit and it intersects the southern boundary of the North Wah Wah Mountains BLM LWC unit which is contiguous and in close proximity to the Wah Wah Mountains Wilderness Study Area. It also cuts into northern portions of the Mountain Home Range North proposed wilderness unit.

In the Utah section of the corridor, the Agencies are considering realignment between MP 70 and MP 110, which does not address the concerns we raised in our Corridor Abstract comments.³⁸ The Agencies would “consider realigning the corridor east along either existing 230-kV transmission lines, Highway 50, or south of Highway 50 to avoid WSAs.”³⁹ The Agencies would also consider re-routing the corridor between MP 83 and MP 93 east of Highway 21.⁴⁰ An IOP might be developed for LWC along this corridor.⁴¹

While there seem to be some improvements being proposed relative to protecting wilderness quality lands, the Agencies should consider the recommendations we made for corridor 110-114 to protect wilderness quality lands more thoroughly. As the Agencies note, “there is little demand for energy transmission along the current designated route.”⁴² Moreover, as discussed at length in the Report and the Corridor Summaries, there is an opportunity to develop a new “potential energy corridor” that would avoid many of the problematic areas along the current route in Utah altogether. These issues should be fully considered in a further analysis.

We also note intersection with the High Schells Wilderness at MP 40-42. BLM will revise the corridor along Highway 50 to avoid overlapping the Cave Creek, Cooper, and South Schells Inventoried Roadless Areas (IRA), and the High Schells Wilderness within the Humboldt-Toiyabe National Forest.⁴³ We support these changes.

j. Corridor 110-114, Utah

This potential addition intersects WSA Howell Peak and NLCS related LWC: Howell Peak. These conflicts must be avoided.

II. Corridors Deletions

a. Corridor 232-233 (E), Nevada

This corridor is in south central Nevada east of U.S. Highway 93 and north of Interstate-15. In our comments on the Corridor Abstracts Regions 2 and 3 Regional Review (submitted to the

³⁸ Report, p. 25. See also Corridor Summaries, p. 80 (Fig. 3.5-25e).

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ Corridor Summaries, p. 80.

⁴² Corridor Summaries, p. 163. See also Corridor Summaries, p. 68. and Appendix E-11.

⁴³ Report, p. 77.

Agencies on February 23, 2018) we asked that the corridor be deleted to eliminate unnecessary impacts to wilderness resources or the corridor be re-routed to avoid Desert Tortoise Conservation Area. In addition, we identified numerous other species not identified in the corridor abstract that could be impacted.

The Agencies recognize that this corridor could be deleted stating “Consider deleting Corridor 232-233(E) but retaining Corridor 232-233(W)”⁴⁴ and “Corridor 232-233(E) does not meet the siting principles because there is no existing infrastructure within the corridor; and development could create an island and fragment desert tortoise habitat.”⁴⁵

We support deletion of this corridor and appreciate that the Agencies are making this change because the deletion of this corridor will protect Desert Tortoise and the Kane Springs Area of Critical Environmental Concern (ACEC). We would also like to point out that the deletion of the corridor will have significant benefits for wilderness quality lands. We encourage the Agencies to explicitly recognize that benefit in the corridor summary and in Appendix E-3.

b. Corridor 130-274, Colorado

This corridor runs through Dolores County, Montezuma County, and San Miguel County, Colorado. The corridor intersects with existing Gypsum Valley ACEC and potentially harms Gunnison sage-grouse. In our comments in 2018, we had requested that this corridor be re-routed to avoid critical habitat for Gunnison sage-grouse. The Agencies are considering revising this corridor by partially deleting Corridor 130-274, deleting Corridor 130-174(E) and adding a new corridor west of Corridor 130-274 following the existing transmission line and county road. We support the deletion of this corridor and addition of a new corridor to maintain a north-south route for electric transmission lines. However, we noted an error in the corridor summary. The main report suggests that Agencies are considering deleting Corridor 130-274 from MP 0 to 32⁴⁶ but the corridor summary states that the Agencies are proposing to delete the corridor 130-274 from MP 0 to 10.⁴⁷ We request the Agencies to correct the error in the corridor summary and clarify that the proposed deletion is from MP 0 to 32.

We believe that the deletions and addition minimize impacts to Gunnison Sage-grouse by moving away from the Miramonte sub-population of Gunnison Sage-grouse which is the most viable of the San Miguel Basin and outside of the Gunnison Basin.

III. Corridors Additions

a. San Miguel/Dolores Corridor

By partially deleting Corridor 130-274, deleting Corridor 130-174(E) and adding this new corridor west of Corridor 130-274 following the existing transmission line and county road, the changes will protect the ACEC and the listed Gunnison sage-grouse. We support the proposed addition and ask that the Agencies commit to these changes, except where it jogs north at the very southeast end of the corridor at Dolores River Canyons and into the LWC. That area should be

⁴⁴ Report, Table 3-1, p. 28. See also Corridor Summaries, p. 153 and 154. (Fig. 3.5-51c).

⁴⁵ *Id.* See also Corridor Summaries, p. 153. Development is not planned in this corridor. Appendix at A-7.

⁴⁶ Report, p. 28.

⁴⁷ Corridor Summaries, p. 117.

avoided because it is managed as LWC and provides a vital recreation site for that area, including the Bradfield Recreation Site campground and boat launch for the Dolores River.

Potential Corridor Revision: Corridor 73-133

While this potential addition helps avoid most LWC, there is an intersection with BLM LWC Unit CON-010-047 at milepost 46. This could be shifted further east to avoid that area.

Potential Corridor Revision: Corridor 87-277

This corridor was also discussed above in Section I. The potential revisions to this corridor avoid conflict in Gunnison Field Office, but the same cannot be said for the revisions on this corridor in the Royal Gorge Field Office. In the Royal Gorge Field Office, the potential addition avoids northern LWC units, but the shift causes new intersections with southern LWC units. Specifically, there are 387 acres overlap with the corridor revision and BLM LWC at MP 38-42 with LWC Unit COF-020-056. There is also 107 acres of overlap with BLM LWC and the potential revision at MP 33 with LWC unit COF-020-019.

At MP 108-111, the corridor avoids ACEC conflict to the north, but the potential revision results in more ACEC conflict to the south (South Beaver Creek ACEC).

WWEC 87-277 is identified as a Corridor of Concern because it traverses conservation resources. In our comments, we highlighted our concerns regarding the WWEC and the potential impact to sensitives resources if BLM retains the existing designation. While we appreciate that the potential revisions could alleviate some conflict in the Gunnison Field Office, concerning conflicts remain in the Royal Gorge Field Office. The Agencies should therefore either eliminate the corridor to alleviate resource conflicts or fully consider ways to improve WWEC 87-277 and avoid intersections with conservation resources.

Potential Corridor Revision: Corridor 144-275

Potential revisions intersect with 3,750 acres of roadless area. This adjustment does not eliminate intersections with IRAs but increases intersections and expands the corridor. It may be possible the GIS data is attributed incorrectly as an addition when it should be a deletion. IRA units must be avoided.

b. Curecanti-Rifle Corridor

The Regions 2 and 3 Report identifies a potential new energy corridor in western Colorado called the Curecanti-Rifle Corridor. The Agencies propose this new corridor as a 3,500-foot multi-modal corridor for electric transmission and pipelines. This potential corridor would cut through a sensitive landscape that includes Colorado Roadless Areas, recommended wilderness, Gunnison sage-grouse habitat, areas with important cultural and historical resources, and other important public lands resources, and is therefore inappropriate for new corridor designation.

The northern portion of the potential corridor addition, from Rifle to Paonia, bisects a largely wild and intact landscape on the Grand Mesa, Uncompahgre, Gunnison (GMUG) and White River National Forests. It would snake through Colorado Roadless Areas in and around the Thompson Divide and on the Grand Mesa and overlaps with the Chalk Mountain recommended wilderness area—which the Forest Service is considering for protection through the ongoing GMUG forest

plan revision. These roadless areas provide important habitat and migration corridors for big game species and are ecologically significant as well as valuable for hunting and other outdoor recreation. The potential corridor would also cut directly through the Mule Park IBA. The Mule Park IBA was recognized because of its extreme importance for cavity nesting birds, particularly western purple martins. Portions of the route also overlap with important historic and cultural resources, including areas significant to the Ute people and camps utilized by the Dominguez-Escalante expedition in their 1776 expedition.

We note that the proposed corridor appears to follow an existing 220-450 kV transmission line, as well as a portion of the Bull Mountain pipeline. However, the existence of limited infrastructure does not make this area appropriate for development of additional energy infrastructure. Energy corridor designation would potentially incentivize large amounts of new infrastructure within the corridor, and a corridor that is more than a half-mile wide would lead to extreme impacts on this landscape. The Agencies should not be driving additional development here through corridor designation.

The southern portion of the potential corridor addition, from Paonia to Cimarron, would overlap significantly with designated critical habitat for Gunnison sage-grouse. This presents the threat of unavoidable impacts to an ESA-listed species. The entire Curecanti-Rifle potential energy corridor would have significant impacts on public lands resources and should be eliminated from further consideration.

c. Santa Fe Corridor

The corridor summary for this proposed addition states that the proposed corridor would meet the siting principles identified in the Settlement Agreement.⁴⁸ The Report provides further explanation on how the siting principles would be met. While we agree that proposing to collocate the potential corridor would minimize potential impacts, the need for new corridor is unclear. The report states that “[T]he transmission grid in New Mexico has historically centered on coal-generated electricity, but as coal-fired power plants in the Four Corners region retire, wind farms and other generation plants could re-supply the market.”⁴⁹ The report notes that the proposed corridor would consist an existing 115kV transmission line as well as the proposed 345kV transmission line. The report fails to explain whether retirement of coal-fired plants will affect transmission capacity of existing line or how the existing and the proposed transmission lines are inadequate the meet the need to transport renewable energy from northeastern New Mexico to the Four Corners energy hub. We request the Agencies to provide an explanation.

In addition, the northwest portion of this potential addition goes through the middle of Santa Fe Canyon Ranch ACEC and the report identifies potential conflict with the El Camino Real de Tierra Adentro National Historic Trail, VRM Class II areas and military training activities. Given the potential for multiple conflict, we encourage the Agencies to reconsider the proposed addition and at the very least encourage the Agencies to avoid the ACEC.

⁴⁸ Corridor Summaries, p. 174.

⁴⁹ *Id.*

d. TransWest Connector Corridor

The Report proposes adding a potential TransWest Connector Corridor in Nevada from MP 136 of Corridor 110-233 east-southeast to the TransWest Express approved route. This potential addition intersects NV BLM LWC from the Ely District Office. The corridor intersects units 0136-21-2012 and 01R-12-2-2011 with a total of 1,220 acres of overlap. We encourage the Agencies to find alternatives to avoid this conflict. We also encourage the Agencies to develop IOP for LWC to assist with avoiding, minimizing, and/or mitigating impacts on LWC.

We also note that this corridor addition has been omitted in Appendix E: Contemplation of Siting Principles for Potential Revisions, Deletions, or Additions to Regions 2 and 3 Section 368 Energy Corridors.

e. Cross-tie Corridor

This potential addition intersects the southern portion of WSA Howell Peak and NLCS related LWC: Howell Peak. The corridor cannot be shifted further south without intersecting Notch Peak WSA. This corridor would need to be very narrow to go between the two WSAs. These conflicts must be avoided.

IV. Corridors with no changes

a. Corridor 46-269, Arizona

This is a Corridor of concern for proposed and designated Wilderness areas, Wild and Scenic Rivers, Three Rivers, Area of Critical Environmental Concern.⁵⁰ The corridor intersects with Sonoran Desert Tortoise Category I and II habitat. In response to our request to re-route the corridor to avoid siting new facilities in Sonoran Desert Tortoise Category I and II management habitat, the Agencies state that “[R]e-routing the corridor to avoid Sonoran Desert Tortoise habitat is not a likely solution because of prevalence of habitat and the value in collocating infrastructure to limit disturbance.”⁵¹ If that is indeed the case, we encourage the Agencies to develop and adopt IOP for wildlife habitat for the corridor.

b. Corridor 68-116, Utah

This corridor runs through southern Utah and northern Arizona from in the vicinity of Page to near Fredonia. In our Corridor Abstract comments, we asked that this corridor be de-designated to avoid conflicts with the Grand Staircase Escalante National Monument and the Pine Hollow citizen-proposed wilderness. The corridor intersects the southern portion of the national monument and it would impact the Pine Hollow citizen-proposed wilderness. Additional infrastructure needs to be avoided in this area.

While the report identifies no changes for this corridor,⁵² there could be potential new IOPs, including for a wildlife migration corridor.⁵³ The Agencies should reconsider the concerns we expressed regarding the Pine Hollow proposed wilderness and the need to avoid it. Even if the boundaries of the Grand Staircase Escalante National Monument have been changed by a

⁵⁰ Appendix, p. E-5.

⁵¹ Corridor Summaries, p. 28.

⁵² Report, p. 30. See also Appendix p. E-24 to 25.

⁵³ Corridor Summaries, p. 44.

presidential proclamation the Agencies need to recognize that decision is being challenged in court and removal of the monument from the corridor may not stand.

c. Corridor 66-212, Utah

Corridor 6-212 runs through southeastern Utah, abutting Arches National Park, the City of Moab, and other world-class BLM-managed public lands. Although it is a Corridor of Concern, the Report states there were no changes were made to the corridor⁵⁴—including changes necessary to avoid impacts to Gunnison Sage-Grouse and critical habitat for other species, LWCs, Old Spanish Trail, Wilderness Study Areas, and areas of critical environmental concern (ACECs) in Emery, Grand, and San Juan Counties, Utah. The Report also fails to account or modify for impacts to citizens' proposed wilderness throughout the length of the corridor, although those impacts were previously identified as issues of concern.

In Emery County, the corridor impacts LWC throughout the span of miles 80 and 101. In Grand County, the corridor impacts LWC between miles 117 to 121 and miles 140 and 144; the Shafer Basin/Long Canyon ACEC between miles 144 and 147; and the Behind the Rocks ACEC between miles 147 to mile 149. In San Juan County, the corridor impacts LWC between miles 162 and 172 and lands proposed for wilderness designation in proposed Americas Red Rock Wilderness Act.

Furthermore, the report fails to provide a sufficient justification for the more than 5-mile-wide corridor through San Juan County, Utah (approx. miles 158 to 181). We recommend narrowing the corridor through northern San Juan County to match width of the corridor through Emery and Grand Counties as well as southern San Juan County (approx. 1.5 miles or less), as this could be done in a way that easily avoids impacts to LWC and citizens' proposed wilderness. Such a modification is also reasonable in light of the lack of any rationale for the current San Juan County corridor width.

d. Corridor 126-218 and 126-133, Utah and Colorado

Corridor 126-218 runs through northeast Utah with parts of it just west (0.1 mile) of Dinosaur National Monument. Corridor 126-133 is just south of the monument running along U.S. Highway 40. In our Corridor Abstract comments, we asked that given the high potential for conflict along these corridors, the Agencies should specify how impacts to Dinosaur National Monument and other protected or sensitive resources will be addressed, and if they cannot adequately address these conflicts, the Agencies should consider eliminating the corridor altogether. Issues of concern in this area besides impacts to the monument include paleontological resources, LWCs and impacts to sage-grouse and visual resource impacts. Also noted in our comments, corridor 126-133 intersects the LWC unit Lower Wolf Creek in White River Field Office. We would recommend narrowing the corridor at MP 30-37 to avoid conflict with BLM LWC.

There are no potential revisions, additions, or deletions being proposed for corridor 126-218.⁵⁵ The same is true of corridor 126-133.⁵⁶ For corridor 126-218, we agree with the Agencies that IOP

⁵⁴ Corridor Summaries, p. 30.

⁵⁵ Report, p. 30.

⁵⁶ *Id.*

could be developed to address LWC as well as migration and winter habitat for species such as moose, pronghorn, bighorn sheep, elk in the area.⁵⁷ No potential IOP additions or deletions have been identified for corridor 126-133.⁵⁸ We believe the same potential IOPs could be applicable to corridor 126-133.

We encourage the Agencies to reconsider comments we've previously raised and ensure there are adequate provisions in place to protect the extremely high-quality environmental values and amenities in Dinosaur National Monument and to ensure protection of resources such as the sage-grouse.

D. Conclusion

Thank you for this opportunity to provide comments on the Report. We commend the Agencies for the progress made to date on planning for energy corridors at a landscape scale and with consideration to renewable energy development and wildlife conservation. We look forward to continuing to work with the Agencies and other stakeholders in the process. Please direct any questions regarding our comments and recommendations to Rupak Thapaliya at rthapaliya@defenders.org.

Sincerely,

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⁵⁷ Corridor Summaries, p. 109.

⁵⁸ *Id.*, p. 107.

Attachments: Exhibit 1
Exhibit 2
Exhibit 3

CC via email: Jeremy Bluma, BLM(jbluma@blm.gov)
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Exhibit 1

Priority Big Game Winter Range map



Exhibit 2

WWEC Intersections with BLM LWC

State	Field / District Office	LWC Unit ID	BLM LWC Unit Name	Filename for BLM LWC GIS Data	Agency	WWEC Zone ID	Mile posts	New or Previously Designated	Corridor Width (feet)	Acres of overlap	WWEC Region
Arizona	Safford	AZ-04-063	Pack Trail	Final_Units_GIS	BLM	81-213	142 - 145	Previously Designated	3,500	1,221	2
Colorado	Gunnison	COS-060-031	Stubbs Gulch	BLM_CO_Inventoried_LWC_2018_061230	BLM	87-277	103 - 108	Previously Designated	5,280	835	2
Colorado	Gunnison	COS-060-029	Sugar Creek	BLM_CO_Inventoried_LWC_2018_061231	BLM	87-277	113 - 114	Previously Designated	5,280	260	2
Arizona	Arizona Strip	NA	Beaver Dam 1	AZ_BLM_WC_notmanaged (INCLUDES_MANAGED)	BLM	113-116	18 - 21	Previously Designated	5,280	396	3
Arizona	Arizona Strip	NA	Mokaac Fault	AZ_BLM_WC_notmanaged (INCLUDES_MANAGED)	BLM	113-116	44	Previously Designated	5,280	17	3
Arizona	Arizona Strip	NA	East Mesa	AZ_BLM_WC_notmanaged (INCLUDES_MANAGED)	BLM	113-116	49 - 54	Previously Designated	5,280	1,305	3
Arizona	Arizona Strip	NA	Hurricane Cliffs	AZ_BLM_WC_notmanaged (INCLUDES_MANAGED)	BLM	113-116	55	Previously Designated	5,280	182	3
Arizona	Arizona Strip	NA	Rock Canyon	AZ_BLM_WC_notmanaged (INCLUDES_MANAGED)	BLM	113-116	55 - 58	Previously Designated	5,280	957	3
Colorado	White River	CON-050-022	Coal Oil Gulch	BLM_CO_Inventoried_LWC_2018_061218	BLM	126-133	13 - 15	Previously Designated	Variable	184	3
Colorado	White River	CON-050-025	Lower Wolf Creek	BLM_CO_Inventoried_LWC_2018_061219	BLM	126-133	30 - 38	Previously Designated	Variable	2,111	3
Colorado	White River	CON-050-008	Ernie Howard Gulch	BLM_CO_Inventoried_LWC_2018_061220	BLM	132-133	60 - 63	Previously Designated	Variable	831	3
Colorado	White River	CON-050-013	Blair Mtn/Grease wood	BLM_CO_Inventoried_LWC_2018_061221	BLM	132-133	72 - 76	Previously Designated	Variable	360	3
Colorado	Little Snake	CON-010-041	Crooked Wash	BLM_CO_Inventoried_LWC_2018_061222	BLM	132-133	84 - 93	New	Variable	1,655	3

Colorado	Grand Junction	CON-030-026	South Shale Ridge	BLM_CO_Inventoried_LWC_2018_061223	BLM	132-133	6 - 8	Previously Designated	26,400	623	3
Colorado	Grand Junction	CON-030-026	South Shale Ridge	BLM_CO_Inventoried_LWC_2018_061224	BLM	132-136	6 - 8	Previously Designated	5,280	3	3
Colorado	Colorado River Valley	CO-070	Roan C Northeast Cliffs	BLM_CO_Inventoried_LWC_2018_061225	BLM	132-276	53 - 54	New	3500	226	3
Colorado	Little Snake	CON-010-045	Little Yampa Canyon	BLM_CO_Inventoried_LWC_2018_061226	BLM	133-142	7 - 13	Previously Designated	3,500	300	3
Colorado	Little Snake	CON-010-047	Cherokee Draw	BLM_CO_Inventoried_LWC_2018_061227	BLM	73-133	46 - 47	Previously Designated	3,500	395	3
Colorado	Little Snake	CON-010-048	Big Hole	BLM_CO_Inventoried_LWC_2018_061228	BLM	73-133	48 - 52	Previously Designated	3,500	385	3
Colorado	Little Snake	CON-010-049	Greasewood Gulch	BLM_CO_Inventoried_LWC_2018_061229	BLM	73-133	55 - 57	Previously Designated	3,500	280	3
Nevada	Ely	092-2012	NA	EYDO_LWC_WS	BLM	110-114	45	New	3500	451	3
Nevada	Ely	01R-12-1-2011	NA	EYDO_LWC_WS	BLM	110-233	125 - 126	Previously Designated	2640	916	3
Nevada	Ely	0136-1-2011	NA	EYDO_LWC_WS	BLM	110-233	148 - 152	Previously Designated	2640	957	3
Nevada	Ely	NV-040-166-3	NA	EYDO_LWC_WS	BLM	110-233	61 - 68	Previously Designated	2640	1,043	3
Nevada	Ely	0145a-2012	NA	EYDO_LWC_WS	BLM	232-233 (E)	25 - 42	New	3500	5,253	3
Nevada	Ely	01R-16-3a-2012	NA	EYDO_LWC_WS	BLM	232-233 (E)	4	New	3500	108	3
Nevada	Ely	0156-4-2012	NA	EYDO_LWC_WS	BLM	232-233 (E)	5 - 14	New	3500	3,258	3
Nevada	Ely	0177-2-2012	NA	EYDO_LWC_WS	BLM	232-233 (W)	15	Previously Designated	2640	99	3

Nevada	Ely	0177-1-2012	NA	EYDO_LWC_WS	BLM	232-233 (W)	15	Previously Designated	2640	176	3
Nevada	Ely	0155-2011	NA	EYDO_LWC_WS	BLM	232-233 (W)	16 - 26	New	2640	2,929	3
Utah	Cedar City	NA	Central Wah Wah	BLM_Utah_NLCS_related_lands	BLM	110-114	126 - 129	New	3500	2,153	3
Utah	Cedar City	NA	North Wah Wah	BLM_Utah_NLCS_related_lands	BLM	110-114	127 - 129	New	3500	6	3
Utah	St George	NA	Zion-Hot Desert	BLM_Utah_NLCS_related_lands	BLM	113-114	27 - 28	Previously Designated	3500	81	3
Utah	St George	NA	Joshua Tree	BLM_Utah_NLCS_related_lands	BLM	113-116	21 - 26	Previously Designated	5280	852	3
Utah	Kanab	NA	Upper Kanab Creek	BLM_Utah_NLCS_related_lands	BLM	116-206	17 - 24	New	3500	1,581	3
Utah	Kanab	NA	Vermilion Cliffs	BLM_Utah_NLCS_related_lands	BLM	116-206	8 - 12	New	3500	402	3
Utah	Vernal	NA	The Rim Rock	BLM_Utah_NLCS_related_lands	BLM	126-218	5	New	3500	588	3
Utah	Vernal	NA	Lower Flaming Gorge	ManagedNaturalAreas_BLM	BLM	126-218	45-48	New	3500	24	3
Utah	Vernal	NA	Mountain Home	ManagedNaturalAreas_BLM	BLM	126-218	56-63	New	3500	31	3
Utah	Vernal	NA	Dead Horse Pass	ManagedNaturalAreas_BLM	BLM	126-218	40-48	New	3500	14	3
Utah	Vernal	NA	Cold Spring Mountain	ManagedNaturalAreas_BLM	BLM	126-218	52-58	New	3500	12	3
Utah	Moab	NA	Arches	BLM_Utah_NLCS_related_lands	BLM	66-212	138	New	Variable	43	3
Utah	Moab	NA	Goldbar Canyon	BLM_Utah_NLCS_related_lands	BLM	66-212	143	New	Variable	40	3
Utah	Moab	NA	Behind the Rocks	BLM_Utah_NLCS_related_lands	BLM	66-212	148 - 159	New	Variable	1,411	3
Utah	Moab	NA	Mill Creek Canyon	BLM_Utah_NLCS_related_lands	BLM	66-212	150 - 152	New	Variable	69	3
Utah	Price	NA	Price River	BLM_Utah_NLCS_related_lands	BLM	66-212	69	New	3500	25	3
Utah	Price	NA	Never Sweat Wash	BLM_Utah_NLCS_related_lands	BLM	66-212	79 - 80	New	3500	93	3
Utah	Moab	NA	Desolation Canyon	BLM_Utah_NLCS_related_lands	BLM	66-212	81 - 94	New	3500	592	3
Utah	Moab	NA	Lost Spring Canyon	BLM_Utah_NLCS_related_lands	BLM	66-212	89	New	3500	7	3

WWEC Intersections with USFS IRAs

State	Forest	Unit ID	Name	Unit Type	WWEC Zone ID	Mile posts	Previously Designated	Acres of Overlap	WWEC Region
Colorado	Pike San Isabel	NA	Sangre de Cristo: Silverheels Gulch to Hunts Creek	Colorado Roadless Area	87-277	52 - 53	Previously Designated	37	2
Colorado	Pike San Isabel	NA	Chipeta	Colorado Roadless Area	87-277	68 - 69	New	144	2
Colorado	Arapahoe & Roosevelt	NA	Bard Creek	Colorado Roadless Area	144-275	3 - 4	New	4	3
Colorado	Arapahoe & Roosevelt	NA	Byers Peak	Colorado Roadless Area	144-275	12 - 14	New	11	3

Exhibit 3

WWEC Intersections with BLM LWC: Potential Candidates for Adjustment

State	Field / District Office	BLM LWC Unit Name	Filename for BLM LWC GIS Data	Agency	WWEC Zone ID	Mile posts for Potential Adjustment	New or Previously Designated	Corridor Width (feet)	Direction for Corridor Adjustment	WWEC Region
Colorado	Gunnison	Stubbs Gulch	BLM_CO_Inventoried_LWC_2018_061223	BLM	87-277	103.5-106	Previously Designated	5,280	North	2
Colorado	Gunnison	Sugar Creek	BLM_CO_Inventoried_LWC_2018_061224	BLM	87-277	113 - 114	Previously Designated	5,280	North	2
Arizona	Arizona Strip	East Mesa	AZ_BLM_WC_notmanaged (INCLUDES_MANAGED)	BLM	113-116	50-54	Previously Designated	5,280	North	3
Arizona	Arizona Strip	Mokaac Fault	AZ_BLM_WC_notmanaged (INCLUDES_MANAGED)	BLM	113-116	44	Previously Designated	5,280	North	3
Arizona	Arizona Strip	Rock Canyon	AZ_BLM_WC_notmanaged (INCLUDES_MANAGED)	BLM	113-116	56 - 58	Previously Designated	5,280	South	3
Colorado	White River	Lower Wolf Creek	BLM_CO_Inventoried_LWC_2018_061218	BLM	126-133	30-32, 35-36	Previously Designated	Variable	Northwest	3
Colorado	White River	Ernie Howard Gulch	BLM_CO_Inventoried_LWC_2018_061219	BLM	132-133	60-63	Previously Designated	Variable	West	3
Colorado	Little Snake	Crooked Wash	BLM_CO_Inventoried_LWC_2018_061220	BLM	132-133	84-85	New	Variable	East	3
Colorado	Little Snake	Blair Mtn/Greasewood	BLM_CO_Inventoried_LWC_2018_061221	BLM	132-133	71.5-75.5	New	Variable	East	3
Colorado	Little Snake	Big Hole	BLM_CO_Inventoried_LWC_2018_061222	BLM	73-133	48 - 52	Previously Designated	3,500	East	3
Nevada	Ely	092-2012	EYDO_LWC_WS	BLM	110-114	43-45	New	3500	South	3
Nevada	Ely	01R-12-1-2011	EYDO_LWC_WS	BLM	110-233	121-126	Previously Designated	2640	West	3
Nevada	Ely	0136-1-2011	EYDO_LWC_WS	BLM	110-233	148 - 152	Previously Designated	2640	Southeast	3
Nevada	Ely	NV-040-166-3	EYDO_LWC_WS	BLM	110-233	61 - 68	Previously Designated	2640	East	3
Nevada	Ely	0177-2-2012	EYDO_LWC_WS	BLM	232-233 (W)	15	Previously Designated	2640	West	3
Nevada	Ely	0155-2011	EYDO_LWC_WS	BLM	232-233 (W)	16-18, 21-26	New	2640	Southeast	3
Utah	St George	Zion-Hot Desert	BLM_Utah_NLCS_related_lands	BLM	113-114	26.2 - 28	Previously Designated	3500	Northwest	3
Utah	Moab	Desolation Canyon	BLM_Utah_NLCS_related_lands	BLM	66-212	82.5-84.5, 86, 87,92, 93, 94	New	3500	West	3

Utah	Price	Price River	BLM_Utah_NLCS_related_lands	BLM	66-212	69	New	3500	East	3
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WWEC Intersections with USFS IRAs: Potential Candidates for Adjustment

Unit Type	WWEC Zone ID	Mile posts for Potential Adjustment	New or Previously Designated Corridor	Corridor Width (feet)	Direction for Corridor Adjustment	WWEC Region
Colorado Roadless Area	87-277	52 - 53	Previously Designated	3500	North	2
Colorado Roadless Area	87-277	68 - 69	New	3500	North	2
Colorado Roadless Area	144-275	3 - 4	New	500	North	3

From: [White, Ellen M.](#)
To: [Fox, Laura R.](#)
Subject: FW: Section 368 Regions 2 & 3 Comments
Date: Tuesday, October 1, 2019 10:57:18 AM

From: Bluma, Jeremy <jbluma@blm.gov>
Sent: Tuesday, October 1, 2019 10:44 AM
To: White, Ellen M. ; Wescott, Konstance L. ; Corridors@anl.gov
Subject: Fwd: Section 368 Regions 2 & 3 Comments

Please add to comments.

----- Forwarded message -----

From: **Quinn, Sarah**
Date: Tue, Oct 1, 2019 at 9:43 AM
Subject: Section 368 Regions 2 & 3 Comments
To: Jeremy Bluma <jbluma@blm.gov>

Jeremy,

I apologize for the lateness of these comments, as they were held up temporarily through our new review process.

Section 368 Corridor Report Review, Regions 2&3

The National Park Service appreciates the opportunity to comment on the 368 Energy Corridor Regions 2 & 3 Report. We also appreciate the dialogue on this project over the past years during the planning and review phases. We recognize and appreciate that many of our previous comments during this process have been considered and incorporated. Our comments during the final report review phase are as follows:

Please include Great Basin National Park in the list of considerations for routing corridor 110-114.

We have no additional comments at this time. We look forward to continued collaboration and coordination with the BLM on the 368 Energy Corridors and related infrastructure projects, specifically during the development of Interagency Operating Procedures (IOPs) applicable to additional planning and permitting processes, as well as construction, operation, and decommissioning.

Please feel free to contact me if you have any questions.

--

Sarah A. Quinn, J.D.

NPS External Renewable Energy Program Manager

Office: (303) 969-2094 Mobile: (303) 902-9258 Email:

Program Website: <http://www.nature.nps.gov/geology/energy/index.cfm>

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Jeremy Bluma, PMP
Realty Specialist / National
Project Manager

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Washington DC Office | WO
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